# **Preliminary Determination Summary**

Equistar Chemicals, LP
Permit Numbers 1768 and N142M1

## I. Applicant

Equistar Chemicals LP PO Box 777 Channelview, TX 77530-0777

## II. Project Location

Channelview Complex 8280 Sheldon Road Harris County Channelview, Texas 77530

## III. Project Description

Equistar submitted an amendment to authorize additional natural gas for the flare (EPN 38E01) in anticipation of the proposed amendments to the 2002 Ethylene Production National Emission Standards for Hazardous Air Pollutants (NESHAP). Additionally, Permit by Rule (PBR) Registration No. 157688 and 157139, and Standard Permit No. 156142 will be incorporated by consolidation. No increases in emissions from maintenance, startup, and shutdown (MSS) activities are included in this project.

## IV. Emissions

Air Contaminant	Proposed Allowable Emission Rates (tpy)
VOC	630.61
NO <sub>x</sub>	2100.96
SO <sub>2</sub>	152.32
CO	2133.92
PM	207.16
PM <sub>10</sub>	192.66
PM <sub>2.5</sub>	178.22
H <sub>2</sub> S	0.03
NH <sub>3</sub>	18.75

Page 2

# V. Federal Applicability

The following chart illustrates the annual project emissions for each pollutant and whether this pollutant triggers PSD or Nonattainment (NA) review.

Pollutant	Project Emissions (tpy)	Major Mod Trigger (tpy)	NA Triggered Y/N	PSD Triggered Y/N
VOC	4.30	25 for NA 40 for PSD	N	N
NOx	19.37	25 for NA 40 for PSD	Y	N
SO <sub>2</sub>	5.59	40	N/A	N
СО	99.79	100	N/A	N

The site is located in Harris County, which has been designated as a serious nonattainment area for ozone. The Channelview Complex is an existing major source of VOC and NO<sub>X</sub>, and the project will result in a significant net increase of NO<sub>X</sub>.

The Channelview Complex is a named source. The site is located in an attainment area for at least one pollutant, and is an existing major stationary source. The project emission increases are below the applicable significant significance threshold in 40 CFR § 52.21(b)(23)(i) for VOC, SO<sub>2</sub>, and CO. PSD BACT and air quality analysis (AQA) requirements do not apply.

Pollutant	Project Increase (tpy) <sup>1</sup>	NA Netting Trigger (tpy)	PSD Netting Trigger (tpy)	Netting Required Y/N	Net Emission Change (tpy) <sup>2</sup>	Major Mod Trigger (tpy)	PSD Triggered Y/N	NA Triggered Y/N
VOC <sup>3</sup>	4.30	5	40	N	N/A	25	N	N
NOx <sup>3, 4</sup>	19.37	5	40	Υ	105.43	25	N	Υ
SO <sub>2</sub> <sup>4</sup>	5.59	N/A	40	N	N/A	40	N	N
СО	99.79	N/A	100	N	N/A	100	N	N

Project Increases: Comparison of Baseline Actual to PTE (or Projected Actual) Increases only

Page 3

- Net Emissions: Baseline Actual to PTE (or Projected Actual) for the project currently under review, Baseline Actual to PTE for all other increases and decreases within netting window.
- Ozone precursor. Either pollutant precursor can trigger BACT/LAER and impacts analysis, as applicable.
- PM<sub>2.5</sub> precursor. Not used to trigger PM<sub>2.5</sub> BACT/LAER or impacts analysis at this time.

## VI. Control Technology Review

A control technology review is required for all new and modified sources. The following controls required by the permits satisfy LAER for emissions of  $NO_X$ , based on a review of recently issued permits from Texas and other states, and consideration of RACT/BACT/LAER Clearinghouse (RBLC) data provided by the applicant.

### Flare

The flare is designed to meet the requirements of 40 CFR Part 60.18 and to achieve a VOC compound destruction efficiency of 99% for compounds with up to three carbons, and 98% for compounds with four or more carbon atoms. The flare is equipped with a continuous flow monitor and composition analyzer.

## VII. Air Quality Analysis

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

#### A. Minor Source NSR and Air Toxics Review

**Table 1. Project-Related Modeling Results for State Property Line** 

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	3.47	14.3

Table 2. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	3.47	7.8
SO <sub>2</sub>	3-hr	3.12	25

Page 4

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
SO <sub>2</sub>	24-hr	1.39	5
SO <sub>2</sub>	Annual	0.28	1
NO <sub>2</sub>	1-hr	3.65	7.5
NO <sub>2</sub>	Annual	0.29	1
СО	1-hr	20.89	2,000
СО	8-hr	1.67	500

The GLC<sub>max</sub> are the maximum predicted concentration associated with one year of meteorological data.

The justification for selecting the EPA's interim 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> De Minimis levels was based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> De Minimis levels. As explained in EPA guidance memoranda<sup>1,2</sup>, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> NAAQS.

#### VIII. Offsets

The site is located in Harris County, which has been designated as a serious nonattainment area for ozone. The Channelview Complex is an existing major source of VOC and NOx, and the project will result in a significant net increase of NOx.

When issued, the permit requires that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H.

www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf

www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

Page 5

The permit holder shall use 23.3 tons per year (tpy) of  $NO_X$  credits to offset the 19.4 tpy  $NO_X$  project emission increase for the facilities authorized by this permit at a ratio of 1.2 to 1.0.

Prior to the commencement of operation, the permit holder is required to obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.

## IX. Alternative Site Analysis and Compliance Certification

The applicant has submitted the required demonstration relating to consideration of alternative sites and Clean Air Act compliance status for sites owned or operated by the applicant (or by any entity controlling, controlled by, or under common control with the applicant). The analysis demonstrated that the benefits of the proposed location and source configuration significantly outweigh the environmental and social costs of that location.

## X. Conclusion

As described above, the applicant has demonstrated that the project meets all applicable rules, regulations and requirements of the Texas and Federal Clean Air Acts. The Executive Director's preliminary determination is that the permits should be issued.

## **Special Conditions**

#### Permit Numbers 1768, PSDTX1272, and N142M1

 This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table.

#### **Federal Applicability**

- These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):
  - A. Subpart A, General Provisions.
  - B. Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.
  - C. Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.
  - D. Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006
  - E. Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
- 3. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants in 40 CFR Part 61:
  - A. Subpart A, General Provisions.
  - B. Subpart J, National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene.
  - C. Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources)
  - D. Subpart FF, National Emission Standard for Benzene Waste Operations
- 4. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63:
  - A. Subpart A, General Provisions.
  - B. 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.
  - C. Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.
  - D. Subpart YY, National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards.

- E. Subpart FFFF, National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.
- F. Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
- G. Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

#### **Emission Standards and Operational Specifications**

- 5. Tanks are approved to store the liquids on the Approved Product List represented in Attachment A.
- 6. The true vapor pressure of any liquid stored at this facility in an atmospheric tank shall not exceed 11.0 psia.
- 7. Storage tanks and storage vessel are subject to the following requirements. The control requirements specified in paragraphs A-D of this condition shall not apply (1) where the volatile organic compounds (VOC) has an aggregate partial pressure of less than 0.50 pound per square inch, absolute (psia) at the maximum feed temperature or 95 °F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.
  - A. The tank emissions must be controlled as specified in one of paragraphs below:
    - (1) An internal floating deck or roof or equivalent control shall be installed in all tanks. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal.
    - (2) An open-top tank containing a floating roof (external floating roof tank) which uses double seal or secondary seal technology shall be an approved control alternative to an internal floating roof tank provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weathershield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.
  - B. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and seal gap measurements as specified in 40 CFR §60.113b, Testing and Procedures, to verify fitting and seal integrity. Records shall be maintained of the dates seals were inspected and seal gap measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies noted.
  - C. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998 except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.
  - D. Except for labels, logos, etc. not exceed 15 percent of tank total surface area, uninsulated tank exterior surfaces exposed to the sun shall be white, gray or specular color. Storage tanks must be equipped with permanent submerged fill pipes.
  - E. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12-

month period. The record shall include tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, VOC throughput for the previous month and year-to-date. Records of VOC monthly average temperature are not required to be kept for unheated tanks which receive liquids that are at or below ambient temperatures.

Emissions from tanks shall be calculated using the methods that were used to determine the MAERT limits in the permit application Form PI-1 dated December 5, 2016. Sample calculations from the application shall be attached to a copy of this permit at the plant site.

8. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the maximum allowable emission rates table. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than one weight percent are not consistent with good practice for minimizing emissions with the exception of safety valves listed below and those that discharge directly to the atmosphere as a result of fire or failure of utilities.

PSV Number	Service	Set	Pressure, psig Operating
38014	TK3912 Make Line	275	25
38065	TK3913 Make Line	250	30
38066	TK3913 to Loading	250	30
38015	P3908A/B Discharge	275	30
38013	TK3911 Make Line	150	25
39021	TK3901 Suction Line	180	25
39022	TK3904 Discharge Line	180	25
39023	P3903A/B Discharge	275	137
38017	P3903A/B Discharge	275	137
39016	TK3902 Suction Line	180	25
38036	TK3901 Make Line	180	25
39001	P3901A/B Discharge	180	30
39017	TK3903 Suction Line	180	25
39036	P3902A/B Discharge	180	48
38012	TK3903 Make Line	180	25
39003	P3902A/B Discharge	180	48
39018	TK3907 Discharge Line	180	25
39043	TK3912 Discharge Line	180	25
39044	P3912A/B/C Discharge	200	156
39040	P3912A/B Discharge	255	53
38016	1st Feed System	275	160

PSV Number	Service	Set	Pressure, psig Operating
38035	3rd Feed System	720	275
38037	Gas Oil-w Mtr Station	180	50
38068	Treated PY Gas	180	20

- 9. Atmospheric relief valves in VOC service that are not equipped with rupture disks shall be checked for leaks on a quarterly basis with an approved gas analyzer. A leak shall be defined as 500 parts per million by volume (ppmv). There shall be no variance for inaccessible valves. All leaking valves shall be repaired or replaced at the earliest opportunity but not later than the next scheduled process shutdown.
- 10. Analyzer sample system vents or speed loops shall be equipped with vapor recovery or liquid recovery systems (vapor samples routed to flare system or liquids samples route back to process). Analyzer (gas chromatographs) vapor sample loops shall depressurize to atmospheric pressure during sample injection only and shall be routed to the flare during periods when a sample is not being injected. The following analyzer is exempt from the vapor recovery or liquid recovery system requirements: J-3904.
- 11. Cracking heaters and heaters associated with the Olefins Production Unit No. 1 shall not exceed the following firing rates: **(TBD)**

EPN	Facility Name	Firing Rate (MMBtu/hr)
34E01	Crack Heaters F3401 / F3402	540*
34E02	Crack Heaters F3403 / F3404	540*
34E03	Crack Heaters F3405 / F3406	540*
34E04	Crack Heaters F3407 / F3408	540*
34E05	Crack Heaters F3409 / F3410	540*
34E06	Crack Heaters F3411 / F3412	540*
34E07	Crack Heaters F3413 / F3414	540*
34E19	Crack Heater F3415	270
34E18	Ethane Cracking Heater F3418	270
38E04	Superheaters F38001A / F38001B	380*
34HTHTRS	34HTHTR Total	4,700
EF3419	Cracking Heater 19	640
Cracking Firing Limit for Cracking Heater 19 and 34HTHTR Total		5,275
36E05	Regen Heater F3601	25
37E03	Recycle Heater F3701	25
Firing Limit Total		5,315

\* The firing rates are sum of two heaters' firing rates.

The heating value of the fuel (Btu/scf) and the fuel flow rate shall be continuously monitored for the cracking heaters, ethane heater, and steam superheaters. Quality-assured (or valid) data must be generated when the fired unit is operating. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the fired unit operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded. Compliance with air contaminant emission limits shall be based upon the above firing rate.

- 12. Purchase gas combusted at this facility shall be sweet natural gas containing no more than five grains of total sulfur per 100 dry standard cubic feet.
- 13. Concentrations of NH₃ from the Cracking Heaters Stack (Emission Point Nos. EPN 34HTHTRS, EPN EF3419) shall not exceed 10 ppmvd on an hourly basis when corrected to three percent oxygen (O₂). The NH₃ concentration shall be tested or calculated according to one of the three methods listed below:
  - A. The holder of this permit may install, calibrate, maintain, and operate a CEMS to measure and record the concentrations of NH<sub>3</sub>. The NH<sub>3</sub> concentrations shall be corrected and reported in accordance with Special Condition No. 23.
  - B. If a sorbent tube device specific for NH<sub>3</sub> is used, the frequency of the sorbent tube testing shall be daily for the first 60 days of SCR operation, after which, the frequency of the sorbent tube testing may be reduced from daily to weekly after operating procedures have been developed to prevent excess amounts of NH<sub>3</sub> from being introduced, and when operation of the SCR system has been proven successful with regard to controlling NH<sub>3</sub> slippage.
  - C. As an approved alternative to sorbent or stain tube testing or an NH<sub>3</sub> CEMS, the permit holder may install and operate a second oxides of nitrogen (NO<sub>x</sub>) CEMS probe located upstream of the SCR and the stack NO<sub>x</sub> CEMS, which may be used in association with the SCR efficiency and NH<sub>3</sub> injection rate to estimate NH<sub>3</sub> slip.
  - D. Any other method used for measuring NH<sub>3</sub> slippage shall require prior approval from the TCEQ.
- 14. The permit holder shall maintain the piping and valves in NH<sub>3</sub> service as follows:
  - A. Audio, olfactory, and visual checks for NH<sub>3</sub> leaks within the operating area shall be made per
  - B. Immediately, but no later than 24 hours upon detection of a leak, plant personnel shall take one or more of the following actions:
    - Locate and isolate the leak, if necessary. Commence repair or replacement of the leaking component. Use a leak collection or containment system to control the leak until repair or replacement can be made if immediate repair is not possible.
- 15. Records of AVO checks, any maintenance performed on piping and valves in NH<sub>3</sub> service, accidental releases, venting, and any corrective actions taken shall be maintained by the holder of this permit.

- 16. The OPI Flare (EPN 38E01) shall be designed and operated in accordance with the following requirements:
  - A. The flare systems shall be designed such that the combined assist natural gas and waste stream to each flare meets the 40 CFR §60.18 specifications of minimum heating value and maximum tip velocity under normal, upset, and maintenance flow conditions.
    - The heating value and velocity requirements shall be satisfied during operations authorized by this permit. Flare testing per 40 CFR §60.18(f) may be requested by the appropriate TCEQ Regional Office to demonstrate compliance with these requirements.
  - B. The flare shall be operated with a flame present at all times and/or have a constant pilot flame. The pilot flame shall be continuously monitored by a thermocouple or an infrared monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to and shall be calibrated at a frequency in accordance with, the manufacturer's specifications.
  - C. The flare shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. This shall be ensured by the use of steam assist to the flare.
  - D. The permit holder shall install a continuous flow monitor and composition analyzer that provides a record of the vent stream flow and composition to the flare. The flow monitor sensor and analyzer sample points shall be installed in the vent stream as near as possible to the flare inlet such that the total vent stream to the flare is measured and analyzed. Readings shall be taken at least once every 15 minutes and the average hourly values of the flow and composition shall be recorded each hour.

The monitors shall be calibrated on an annual basis to meet the following accuracy specifications: the flow monitor shall be  $\pm 5.0$  percent, the temperature monitor shall be  $\pm 2.0$  percent at absolute temperature and the pressure monitor shall be  $\pm 5.0$  mm Hg.

Calibration of the analyzer shall follow the procedures and requirements of Section 10.0 of 40 CFR Part 60, Appendix B, Performance Specification 9, as amended through October 17, 2000 (65 FR 61744), except that the multi-point calibration procedure in Section 10.1 of Performance Specification 9 shall be performed at least once every calendar quarter instead of once every month, and the mid-level calibration check procedure in Section 10.2 of Performance Specification 9 shall be performed at least once every calendar week instead of once every 24 hours. The calibration gases used for calibration procedures shall be in accordance with Section 7.1 of Performance Specification 9. Net heating value of the gas combusted in the flare shall be calculated according to the equation given in 40 CFR §60.18(f)(3) as amended through October 17, 2000 (65 FR 61744).

The monitors and analyzers shall operate as required by this section at least 95% of the time when the flare is operational, averaged over a rolling 12-month period. Flared gas net heating value and actual exit velocity determined in accordance with 40 CFR §§60.18(f)(3) and 60.18(f)(4) shall be recorded at least once every hour. Hourly mass emission rates shall be determined and recorded using the above readings and the emission factors used in the permit renew and amendment application (PI-1 dated December 05, 2016).

E. The OPI Flare (EPN 38E01) shall operate in accordance with the 40 CFR 63 Subpart YY "National Emission Standards for Hazardous Air Pollutants: Generic Maximum Achievable Control Technology Standards Residual Risk and Technology Review for Ethylene Production" signed by the EPA Administrator as a final rule on March 12, 2020, the

subsequently promulgated final version of that subpart, and Alternate Method of Control (AMOC) No. 157 issued May 12, 2020. Compliance with the requirements of this paragraph shall begin December 31, 2020 and occur as otherwise specified in the AMOC. Prior to the compliance requirements and schedule of this paragraph, Special Condition Nos. 16.A through 16.D shall apply. **(TBD)** 

#### **Compliance Assurance Monitoring**

- 17. The following requirements apply to capture systems for the flare system (EPN 38E01). (TBD)
  - A. Either conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system; or verify the capture system is leak-free by inspecting in accordance with 40 CFR Part 60, Appendix A, Test Method 21 once a year. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppmv above background.
  - B. If there is a bypass for the control device, comply with either of the following requirements:
    - (1) Install a flow indicator that records and verifies zero flow at least once every fifteen minutes immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere; or
    - (2) Once a month, inspect the valves, verifying that the position of the valves and the condition of the car seals that prevent flow out the bypass.

A bypass does not include authorized analyzer vents, highpoint bleeder vents, low point drains, or rupture discs upstream of pressure relief valves if the pressure between the disc and relief valve is monitored and recorded at least weekly. A deviation shall be reported if the monitoring or inspections indicate bypass of the control device when it is required to be in service per this permit.

C. The date and results of each inspection performed shall be recorded. If the results of any inspection are not satisfactory, the deficiencies shall be recorded and the permit holder shall promptly take necessary corrective action, recording each action with the date completed.

## **Fugitive Emissions Monitoring**

18. Piping, valves, connectors, pumps, agitators, and compressors in VOC service -28VHP

Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:

The following requirements apply to piping, valves, connectors, pumps, agitators, and compressors containing or in contact with fluids that could reasonably be expected to contain greater than or equal to 10 weight percent volatile organic compounds (VOC) at any time.

A. The requirements of paragraphs F and G shall not apply (1) where the Volatile Organic Compound (VOC) has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition

shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

- piping and instrumentation diagram (PID);
- a written or electronic database or electronic file;
- color coding;
- a form of weatherproof identification; or
- designation of exempted process unit boundaries.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in Paragraph A above. If an unsafe to monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe to monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;

- a cap, blind flange, plug, or second valve must be installed on the line or valve;
   or
- (2) the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the

results recorded. For all other situations, the open-ended valve or line shall be monitored once within the 72 hour period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. If a relief valve is equipped with rupture disc, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed at least quarterly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs is being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, then the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

Replacements for leaking components shall be re-monitored within 15 days of being placed back into VOC service.

- G. Except as may be provided for in the special conditions of this permit, all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days and a record of the attempt shall be maintained.

- Ι. A leaking component shall be repaired as soon as practicable, but no later than 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shut down as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shut down or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.
- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.
- K. Alternative monitoring frequency schedules of 30 TAC 115.352 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.
- 19. Pump and compressors equipped with single seals in HRVOC (as defined in 30 TAC §115.10 unless exempted by §115.787) or greater than 10 weight percent benzene service shall be monitored with a leak definition of 500 ppmv rather than the 2,000 ppmv identified in Special Condition No. 17H.
- 20. In addition to the weekly physical inspection required by Item E of Special Condition No. 17, all connectors in non-HRVOC gas/vapor and light liquid service shall be monitored annually with an approved gas analyzer in accordance with Items F through J of Special Condition No. 17. Alternative monitoring frequency schedules (skip options) of 40 CFR Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, may be used in lieu of the monitoring frequency required by this permit condition. Compliance with this condition does not assure compliance with requirements of applicable state or federal regulation and does not constitute approval of alternative standards for these regulations.
- 21. In addition to the weekly physical inspection required by Item E of Special Condition No. 17, all accessible connectors in HRVOC gas/vapor and light liquid service shall be monitored quarterly with an approved gas analyzer in accordance with Items F through J of Special Condition No. 17.

- A. Connectors may be monitored on a semiannual basis if the percent of connectors leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.
  - Connectors may be monitored on an annual basis if the percent of connectors leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.
  - If the percent of connectors leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.
- B. The percent of connectors leaking used in paragraph A shall be determined using the following formula:

$$\frac{C_l + C_s}{C_t} \times 100 = C_p$$

Where:

- C<sub>I</sub> = the number of connectors found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- C<sub>s</sub> = the number of connectors for which repair has been delayed and are listed on the facility shutdown log.
- Ct = the total number of connectors in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor connectors.
- $C_p$  = the percentage of leaking connectors for the monitoring period.

#### Piping, Valves, Pumps, Agitators, and Compressors - Intensive Directed Maintenance - 28LAER

22. This special condition applies to components associated with the construction of Cracking Heater F-3419 as submitted in the application dated September 23, 2011.

Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment:

A. The requirements of paragraphs F and G shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

- i. piping and instrumentation diagram (PID);
- ii. a written or electronic database or electronic file;
- iii. color coding;
- iv. a form of weatherproof identification; or
- v. designation of exempted process unit boundaries.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American

Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in subparagraph A above. If an unsafe-to-monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe-to-monitor times. A difficult-to-monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance.

Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through. In addition, all connectors shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer with a directed maintenance program in accordance with items F thru J of this special condition.

In lieu of the monitoring frequency specified above, connectors may be monitored on a semiannual basis if the percent of connectors leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.

Connectors may be monitored on an annual basis if the percent of connectors leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of connectors leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

The percent of connectors leaking used in paragraph B shall be determined using the following formula:

$$\frac{C_l + C_s}{C_t} \times 100 = C_p$$

Where:

- C<sub>I</sub> = the number of connectors found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- C<sub>s</sub> = the number of connectors for which repair has been delayed and are listed on the facility shutdown log.

- Ct = the total number of connectors in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor connectors.
- $C_p$  = the percentage of leaking connectors for the monitoring period.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;

- i. a cap, blind flange, plug, or second valve must be installed on the line or valve; or
- ii. the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once by the end of the 72 hours period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.
- F. Accessible valves shall be monitored by leak-checking for fugitive

emissions at least quarterly using an approved gas analyzer with a directed maintenance program. Non-accessible valves shall be monitored by leak-checking for fugitive emissions at least annually using an approved gas analyzer with a directed maintenance program. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown. A check of the reading of the pressure-sensing device to verify disc integrity shall be performed at least quarterly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs are being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, than the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

- A directed maintenance program shall consist of the repair and maintenance of components assisted simultaneously by the use of an approved gas analyzer such that a minimum concentration of leaking VOC is obtained for each component being maintained. Replaced components shall be re-monitored within 15 days of being placed back into VOC service.
- G. All new and replacement pumps, compressors, and agitators shall be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. These seal systems need not be monitored and may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
  - All other pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly.
- Н. Damaged or leaking valves, connectors, compressor seals, pump seals, and agitator seals found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days. Records of the first attempt to repair shall be maintained. A leaking component shall be repaired as soon as practicable, but no later than 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shutdown as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.
- I. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.
- J. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS), and does not constitute approval of alternative standards for these regulations.

- K. In lieu of the monitoring frequency specified in paragraph F, valves in gas and light liquid service may be monitored on a semiannual basis if the percent of valves leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.
  - Valves in gas and light liquid service may be monitored on an annual basis if the percent of valves leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.
  - If the percent of valves leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.
- L. The percent of valves leaking used in paragraph K shall be determined using the following formula:

$$\frac{(V_l + V_s)}{V_t} \times 100 = V_p$$

Where:

- V<sub>I</sub> = the number of valves found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- V<sub>s</sub> = the number of valves for which repair has been delayed and are listed on the facility shutdown log.
- Vt = the total number of valves in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe to-monitor valves.
- $V_p$  = the percentage of leaking valves for the monitoring period.
- M. Any component found to be leaking by physical inspection (i.e., sight, sound, or smell) shall be repaired or monitored with an approved gas analyzer within 15 days to determine whether the component is leaking in excess of 500 ppmv of VOC. If the component is found to be leaking in excess of 500 ppmv of VOC, it shall be subject to the repair and replacement requirements contained in this special condition.

### **Initial Determination of Compliance**

- 23. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the cracking heaters (EPN 34HTHTRS for F-3401, F-3402, F-3403, F-3404, F-3405, F-3406, F-3407, F-3408, F-3409, F-3410, F-3411, F-3412, F-3413, F-3414, F-3418, and EPN EF3419 for F-3419). Three cracking furnace stacks, to be determined by the permit holder with agreement of the TCEQ Houston Regional Office may be tested as representative of the eight cracking furnace stacks, Ethane Heater (EPN 34E18), and Steam Superheaters (EPN 38E04). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.
  - A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

(1) Date for pretest meeting.

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

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

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

Requests to waive testing for any pollutant specified in B of this condition shall be submitted to the TCEQ, Office of Permitting and Registration, Austin.

Test waivers and alternate/equivalent procedure proposals for NSPS testing which must have the EPA approval shall be submitted to the TCEQ Houston Regional Office, Houston.

- B. Air contaminants emitted from the cracking heaters, ethane heater, and steam superheaters to be tested for include (but are not limited to) NO<sub>x</sub> and CO.
- C. Sampling may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office.
- D. The source being tested shall operate at maximum represented operating rates during stack emission testing. Primary operating parameters that enable determination of firing rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting.
  - If the source is unable to operate at maximum represented operating rates during testing, then additional stack testing may be required when higher represented operating rates are achieved.
- E. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after all sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Houston Regional Office, Houston.

One copy to the Harris County Air Pollution Control Program, Pasadena.

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

24. The permit holder shall install, calibrate, and maintain a predictive emission monitoring system (PEMS) to measure and record the in-stack concentration of NO<sub>x</sub> from the Cracking Heaters (EPN 34HTHTRS for F-3401, F-3402, F-3403, F-3404, F-3405, F-3406, F -3407, F-3408, F-3409, F-3410, F-3411, F-3412, F-3413, F-3414, and F-3418, and EPN EF3419 for F-3419) when in operation.

- A. A PEMS may be used for demonstrating continuous compliance if it can be proven to have the same or better accuracy, precision, reliability, accessibility, and timeliness as that provided by a hardware CEMS. All PEMS shall be subject to the approval of the TCEQ Executive Director. Owners or operators must petition the TCEQ Executive Director for approval to use PEMS. The petition must include results of tests conducted beforehand to demonstrate equivalent accuracy and precision of PEMS to that of hardware CEMS. Demonstrating equivalency of PEMS to CEMS shall be met by instantaneously comparing data collected by PEMS with that collected by a certified hardware CEMS or an EPA reference method. For a PEMS replacing a CEMS, both systems shall remain in place for at least an operating quarter collecting valid information before the CEMS is removed.
- B. For any unit at which the PEMS is installed, PEMS initial certification by the TCEQ shall occur while the unit is firing its primary fuel. The owner or operator shall:
  - (1) Conduct relative accuracy testing for  $NO_x$  and  $O_2$ , or carbon dioxide ( $CO_2$ ) per 40 CFR Part 60, Appendix B, Performance Specifications 2, 3, and 4, respectively, at low, medium, and high levels of the most significant operating parameter affecting  $NO_x$  emissions.
  - (2) Conduct statistical test analysis at low, medium, and high levels of the most significant operating parameter affecting NO<sub>x</sub> emissions. A minimum of 30 successive paired data points which are either 15-minute averages, 20-minute averages, or hourly averages must be collected at each tested level before a reliable statistical test can be performed.

Data collection must be continuous at all times except when calibration of the reference method must be conducted for the purpose of collecting data for relative accuracy test audit (RATA).

The following three tests must be conducted to demonstrate precision:

- i. A T-test for bias per Appendix A, 40 CFR Part 75, § 7.6. The test shall be conducted using all paired data points collected at all three tested levels.
- ii. An F-test per 40 CFR §75.41(c)(1). The F-test must be conducted separately at the three tested levels.
- iii. A correlation analysis per 40 CFR §75.41(c)(2). Calculation of the correlation coefficient (Equation 27) shall be performed using all paired data points collected at all three tested levels.
- (3) For NO<sub>x</sub> and CO and for the purpose of conducting an F-test, if the standard deviation (SD) of the reference method is less than either 3 percent of the span or 5 parts per million (ppm), use a reference method SD of the greater of 5 ppm or 3 percent of span.
- (4) For diluent CO<sub>2</sub> or O<sub>2</sub> and for the purpose of conducting an F-test, if the SD of the reference method is less than 3 percent of span, use a reference method SD of 3 percent of span.
- (5) For NO<sub>x</sub> at anyone tested level, if the mean value of the reference method is less than either 10 ppm or 5 percent of the standard, all statistical tests are waived for that emission parameter at that specific tested level.
- (6) For either O<sub>2</sub> or CO<sub>2</sub> and at anyone tested level, if the mean value of the reference method is less than 3 percent of span, all the statistical tests are waived for that diluent parameter at that specific tested level.

- C. The monitoring data shall be reduced to hourly average concentrations at least once every day, using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of pound per million Btu at least once every week. All monitoring data and quality-assurance data shall be maintained by the permit holder.
- D. Any PEMS downtime shall be reported to the appropriate TCEQ Regional Director per §117.345(d)(3) and necessary corrective action shall be taken. Quality-assured (or valid) data must be generated when the cracking heaters (EPN 34HTHTRS and EF3419) are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed five percent of the time (in minutes) that the cracking heaters (EPN 34HTHTRS and EF3419) operated over the previous rolling 12-month period. Owners or operators shall demonstrate that all missing data can be accounted for in accordance with the applicable missing data procedures of 30 TAC 117.340. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.
- E. The appropriate TCEQ Regional Office shall be notified for each annual RATA in order to provide them the opportunity to observe the testing.
- F. The owner or operator shall perform daily sensor validation. The owner or operator shall develop and implement plans that will ensure proper functioning of the monitoring systems, ensure proper accuracy and calibration of all operational parameters that affect emissions and serve as input to the predictive monitoring system, and ensure continuous operation within the certified operating range.
- G. In accordance with the procedure of § 2.3.1, Appendix B of 40 CFR Part 60, a RATA must be performed every six months for each unit while firing its primary fuel. A RATA may be performed annually if the relative accuracy of the previous audit is 7.5 percent or less.
- H. For each of the three successive quarters following the quarter in which initial certification was conducted, RATA and statistical testing must be conducted for at least one unit in a category of units in accordance with the procedures outlined for initial certification under Section B.
- Any RATA exceeding 20 percent or statistical test exceeding the applicable standard shall be reported to the appropriate TCEQ Regional Director, and necessary corrective action shall be taken.
- J. When an alternative fuel is fired in a unit, PEMS must be re-certified in accordance with the certification procedures outlined for initial certification under Section B. Owners or operators may justify to the satisfaction of the TCEQ Executive Director that slight changes in fuel composition do not constitute an alternative fuel. No additional recertification procedures are required if the unit meets the current monitoring requirements when switching back to the normal fuel from an alternate fuel.
- K. The system is required to provide valid emission predictions for at least 95 percent of the time that the unit being monitored is operated. The following rules for tuning without recertification shall be followed:
  - (1) The model did not change fundamentally.
  - (2) The model continues to operate within the initially certified operating ranges.

Otherwise, the system must be recertified. Any tuning must be documented, and the records must be made available during any future inspection.

- L. All owners or operators shall develop a quality-assurance plan or manual that insures continuous and reliable performance of the PEMS. As part of the plan, owners or operators shall recommend a frequency for calibrating each sensor whose readout serves as an input to the model. All sensors, at a minimum, shall be calibrated as often as recommended by the manufacturer.
- M. As an alternative to Paragraphs A.-L. of this condition, the permit holder may install a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of NO<sub>x</sub> from the Cracking Heaters (EPN 34HTHTRS for F-3401, F-3402, F-3403, F-3404, F-3405, F-3406, F-3407, F-3408, F-3409, F-3410, F-3411, F-3412, F-3413, F-3414, F-3415, F-3418 and EPN EF3419 for F-3419) when in operation. The CEMS shall meet the requirements in special condition 23 A.-E. of this permit.
- 25. Opacity of emissions from cracking heaters, heaters, and decoking cyclones shall not exceed 15 percent averaged over a six-minute period except for those periods described in 30 TAC §111.111.

#### **Production Limits and Recordkeeping**

26. Production rates shall not exceed 11.3 billion pounds per year of all products. The holder of this permit shall maintain records on the operation of the facility for five years. Records shall include (but are not limited to) hours of operation, production rates, hours of operation of each heater unit, time period pre-regeneration gases are purged to each flare unit, and time period regeneration cycle emits to the atmosphere.

#### **Cooling Tower**

- 27. The VOC associated with cooling tower (EPN 38E11) water shall be monitored monthly with an air stripping system meeting the requirements of the TCEQ Sampling Procedures Manual, Appendix P (dated January 2003 or a later edition) or an approved equivalent sampling method. The results of the monitoring, cooling water flow rate, and maintenance activities on the cooling water system shall be recorded. The monitoring results and cooling water hourly mass flow rate shall be used to determine cooling tower hourly VOC emissions. The rolling 12 month cooling water emission rate shall be recorded on a monthly basis and be determined by summing the VOC emissions between VOC monitoring periods over the rolling 12 month period. The emissions between VOC monitoring periods shall be obtained by multiplying the total cooling water mass flow between cooling water monitoring periods by the higher of the 2 VOC monitored results. Cooling water sampling as required by 30 TAC Chapter 115 Subchapter H may be used in lieu of this special condition.
- 28. Cooling water shall be sampled once a week for total dissolved solids (TDS) and once a day for conductivity. On-line conductivity meter may be used in lieu of collecting daily sample. Dissolved solids in the cooling water drift are considered to be emitted as PM<sub>10</sub>. The data shall result from collection of water samples from the cooling tower feed water and represent the water being cooled in the tower. Water samples should be capped upon collection and transferred to a laboratory area for analysis. The analysis method for TDS shall be EPA Method 160.1, ASTM D5907, and SM 2540 C [SM 19th edition of Standard Methods for Examination of Water]. The analysis method for Conductivity shall be ASTM D1125-95A and SM2510 B. Use of an alternative method shall be approved by the TCEQ Regional Director prior to its implementation.

#### **Wastewater**

29. Process wastewater drains shall be equipped with water seals or equivalent; lift stations, manholes, junction boxes, any process wastewater collection system components, and conveyance, shall be equipped with a closed vent system that routes all organic vapor to a control device.

Water seals shall be checked by visual or physical inspection quarterly for indications of low water levels or other conditions that would reduce the effectiveness of water seal controls. Water seals shall be restored as necessary within 24 hours. Records shall be maintained of these inspections and corrective actions taken.

#### **Diesel Engine**

- 30. The following requirements shall apply to the Diesel Engine-Driven Air Compressor (EPN OP1EN1): **(TBD)** 
  - A. Fuel for the engine shall be limited to ultra-low sulfur diesel (ULSD) containing no more than 15 ppmw total sulfur.
  - B. The engine shall be limited to 4,500 hours per year.
  - C. The engine shall be equipped with a non-resettable hour meter.
  - D. Compliance with the emission factors represented in the permit amendment application (PI-1 dated November 19, 2019) shall be demonstrated by retaining a copy of the manufacturers' certificate of conformity, or through other methods receiving prior written approval of the TCEQ Executive Director

#### Maintenance, Start-Up, and Shutdown Operations

31. This permit authorizes the emissions from facilities for the planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachment C) attached to this permit.

Routine maintenance activities, as identified in Attachment B of this permit, may be tracked through work orders or their equivalent. Emissions from activities identified in Attachment C shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit application.

The performance of each planned MSS activity not identified in Attachment C and the emissions associated with it shall be recorded and include at least the following information:

- A. the process unit at which emissions from the MSS activity occurred, including the emission point number and common name of the process unit;
- B. the type of planned MSS activity and the reason for the planned activity;
- C. the common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
- D. the date and time of the MSS activity and its duration;

- E. the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the permit application, consistent with good engineering practice.
  - All MSS emissions shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis.
- 32. Process units and facilities shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements:
  - A. The process equipment shall be depressurized to a control device, transferred within the process unit, transferred to another process unit, transferred to a pressurized storage tank, or depressurized to a controlled recovery system prior to venting to atmosphere, degassing, or draining liquid. Equipment that only contains material that is liquid with volatile organic compounds (VOC) partial pressure less than 0.50 pound per square inch, absolute (psia) at the highest of the actual temperature or 95°F may be opened to atmosphere and drained in accordance with Paragraph C of this special condition. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded.
  - B. If mixed phase materials must be removed from process equipment, the cleared material shall be routed to a knockout drum or equivalent to allow for managed initial phase separation, transferred within the process unit, transferred to another process unit, or transferred to a pressurized storage tank. If the VOC partial pressure is greater than 0.50 psi at either the actual temperature or 95°F, any vents in the system must be routed to a control device or a controlled recovery system. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. Control must remain in place until degassing has been completed or the system is no longer vented to atmosphere.
  - C. All liquids from process equipment or storage vessels must be removed to the maximum extent practical prior to opening equipment to commence degassing and/or maintenance. Liquids must be drained into a closed vessel or closed liquid recovery system unless prevented by the physical configuration of the equipment, transferred within the process unit, transferred to another process unit, or transferred to a pressurized or an atmospheric storage tank. If it is necessary to drain liquid into an open pan or sump, the liquid must be covered or transferred to a covered vessel within one hour of being drained.
  - D. If the VOC partial pressure is greater than 0.50 psi at the normal process temperature or 95°F, facilities shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the control device or controlled recovery system to the extent allowed by process equipment or storage vessel design. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. The facilities to be degassed shall not be vented directly to atmosphere, except as necessary to establish isolation of the work area or to monitor VOC concentration following controlled depressurization. The venting shall be minimized to the maximum extent practicable and actions taken recorded. The control device or recovery system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.
    - (1) For MSS activities identified in Attachment C, the following option may be used in lieu of item (2) below. The facilities being prepared for maintenance shall not be vented

- directly to atmosphere until the VOC concentration has been verified to be less than 10,000 ppmv or less than 10 percent of the lower explosive limit (LEL) per the site safety procedures.
- (2) The locations and/or identifiers where the purge gas or steam enters the process equipment or storage vessel and the exit points for the exhaust gases shall be recorded (process flow diagrams [PFDs] or piping and instrumentation diagrams [P&IDs] may be used to demonstrate compliance with the requirement). If the process equipment is purged with a gas, two system volumes of purge gas must have passed through the control device or controlled recovery system before the vent stream may be sampled to verify acceptable VOC concentration prior to uncontrolled venting. The VOC sampling and analysis shall be performed using an instrument meeting the requirements of SC No. 28. The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged. The facilities shall be degassed to a control device or controlled recovery system until the VOC concentration is less than 10.000 ppmy or 10 percent of the LEL. Documented site procedures used to de-inventory equipment to a control device for safety purposes (e.g., hot work or vessel entry procedures) that achieve at least the same level of purging may be used in lieu of the above.
- E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:
  - (1) It is not technically practicable to depressurize or degas, as applicable, into the process;
  - (2) There is not an available connection to a plant control system (flare); and
  - (3) There is no more than 50 lbs of air contaminant to be vented to atmosphere during shutdown or start-up, as applicable.
    - All instances of venting directly to atmosphere per sub-paragraph E. of this condition must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those planned MSS activities identified in Attachment C.
- 33. Air contaminant concentration shall be measured using an instrument/detector meeting one set of requirements specified below.
  - A. VOC concentration shall be measured using an instrument meeting all the requirements specified in EPA Method 21 (40 CFR Part 60, Appendix A) with the following exceptions:
    - (1) The instrument shall be calibrated within 24 hours of use with a calibration gas such that the response factor (RF) of the VOC (or mixture of VOCs) to be monitored shall be less than 2.0. The calibration gas and the gas to be measured, and its approximate RF shall be recorded. If the RF of the VOC (or mixture of VOCs) to be monitored is greater than 2.0, the VOC concentration shall be determined as follows:
      - VOC Concentration = Concentration as read from the instrument\*RF
      - In no case should a calibration gas be used such that the RF of the VOC (or mixture of VOCs) to be monitored is greater than 5.0.

- (2) Sampling shall be performed as directed by this permit in lieu of section 8.3 of Method 21. During sampling, data recording shall not begin until after two times the instrument response time. The date and time shall be recorded, and VOC concentration shall be monitored for at least five minutes, recording VOC concentration each minute. As an alternative the VOC concentration may be monitored over a five-minute period with an instrument designed to continuously measure concentration and record the highest concentration read. The highest measured VOC concentration shall be recorded and shall not exceed the specified VOC concentration limit prior to uncontrolled venting.
- B. Colorimetric gas detector tubes may be used to determine air contaminant concentrations if they are used in accordance with the following requirements.
  - (1) The air contaminant concentration measured as defined in (3) is less than 80 percent of the range of the tube and is at least 20 percent of the maximum range of the tube.
  - (2) The tube is used in accordance with the manufacturer's guidelines.
  - (3) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting:

measured contaminant concentration (ppmv) < release concentration.

Where the release concentration is:

10,000\* mole fraction of the total air contaminants present that can be detected by the tube.

The mole fraction may be estimated based on process knowledge. The release concentration and basis for its determination shall be recorded.

Records shall be maintained of the tube type, range, measured concentrations, and time the samples were taken.

- C. Lower explosive limit measured with a lower explosive limit detector.
  - (1) The detector shall be calibrated within 30 days prior to use with a certified pentane gas standard at 58 percent of the LEL for pentane. Records of the calibration date/time and calibration result (pass/fail) shall be maintained.
  - (2) A functionality test shall be performed within 24 hours prior to use on each detector using the same certified gas standard used for calibration. The LEL monitor shall read no lower than 90 percent of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.
  - (3) A certified methane gas standard equivalent to 58 percent of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95 percent of that for pentane.
- D. Gas Chromatograph. As an alternative to an instrument/detector, the analysis may be conducted in a laboratory. Bag samples of the gas discharged may be drawn and taken to an onsite laboratory to be analyzed by gas chromatography (GC). A minimum of two bag samples shall be drawn approximately ten minutes apart. A Tedlar bag, or a bag or glass container appropriate for the material to be sampled, shall be used and shall have a valve to seal gas in the bag or container. The samples shall be drawn as follows:
  - (1) The sample point on the equipment being cleared shall be purged sufficiently to ensure a representative sample at the sample valve.

- (2) The sample bag shall be connected directly to the sample valve or to a pump that is connected directly to the sample valve.
- (3) The sample valve and sample bag shall be opened to allow the bag to fill to approximately 80% of capacity. The sample connections shall be fitted such that no air is drawn into the sample bag.
- (4) The two valves shall then be closed to seal the sample in the bag.
- (5) The sample bag shall then be disconnected and placed in a dark container out of direct sunlight for transport to the analyzer.
- (6) This process is repeated to collect additional samples.
- (7) The sample shall be analyzed within 12 hours of collection.
- (8) If condensation is observed in a bag sample, the sampling must be repeated using one of the modified bag sampling procedures in 40 CFR 60, Appendix A, Method 18 Section 8.
- (9) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting.

The laboratory GC shall meet or exceed the requirements of 40 CFR 60, Appendix A, Method 18 Sections 6 (Equipment and Supplies), 7 (Reagents and Standards), 9 (Quality Control), and 10 (Calibration and Standards). The sample shall be analyzed per Section 8.2.1.5 of Method 18, except the analysis of each bag may be performed in duplicate and use gas tight syringe through septums. The highest measured VOC concentration shall not exceed the specified VOC concentration limit prior to uncontrolled venting. The recovery study for bag sampling and post analysis calibration is only required the first time a vessel is degassed and analyzed if the procedure meets the accuracy specifications of Method 18 and the analytical equipment is not modified. If the material content, temperature and pressure are the same among multiple vessels when sampling occurs, the post analysis calibration need only be conducted on sample(s) from one representative vessel.

- 34. Additional occurrences of MSS activities authorized by this permit may be authorized under permit by rule only if conducted in compliance with this permit's procedures, emission controls, monitoring, and recordkeeping requirements applicable to the activity.
- 35. Planned maintenance activities must be conducted in a manner consistent with good practice for minimizing emissions, including the use of air pollution control equipment, practices and processes. All reasonable and practical efforts to comply with Special Condition Nos. 29 through 33 must be used when conducting the planned maintenance activity, until the Commission determines that the efforts are unreasonable or impractical, or that the activity is an unplanned maintenance activity.

#### **Netting & Offsets**

36. This Prevention of Significant Deterioration (PSD) permit (PSDTX1272), 25.7 tpy NO<sub>x</sub> project increase) is conditioned on the completion of the emission reduction project represented in the permit application (PI-1 dated September 23, 2011) as follows: **(11/12)** 

Methanol Unit Shutdown (November 2008)	
Total NO <sub>x</sub> Reduction:	780.4 tpy

These reductions shall occur prior to the start of operation of the facilities and activities authorized by the indicated PSD permit. The permit holder shall maintain records of these emission reductions.

Construction of the authorized facilities must begin as defined in 40 CFR § 52.21(b)(9), no later than five years after the all emission reductions identified in the NO<sub>x</sub> netting analysis are actually accomplished. If construction does not begin as specified, the netting reductions will no longer be creditable.

This Nonattainment New Source Review (NNSR) permit (N142) is issued based on the permanent retirement of a TCEQ Emission Reduction Credit (ERC) for 22.4 tpy of VOC emissions reduction at Equistar's Chocolate Bayou Polymer Facility. This ERC provides offsets at the rate of 1.3:1 for the 17.2 tpy of VOC emissions authorized as a project increase by the indicated NNSR permit.

- A. The permit holder shall use 22.4 tpy ECs of VOC from TCEQ credit certificate number 3520 to offset the 17.2 tpy VOC project emission increase for the facilities authorized by this permit at a ratio of 1.3 to 1.0. **(TBD)**
- 37. NNSR Permit Number N142M1 is issued/approved based on the requirement that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H. (TBD)
  - A. The permit holder shall use 23.3 tons per year (tpy) of  $NO_X$  credits to offset the 19.4 tpy  $NO_X$  project emission increase for the facilities authorized by this permit at a ratio of 1.2 to 1.0.
  - B. Prior to the commencement of operation, the permit holder shall obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.

#### Permit by Rule

38. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit. **(TBD)** 

Authorization	Source or Activity
PBR 106675	Authorized a flare that was brought on to control H <sub>2</sub> streams from the process.
PBR 110688	Authorized chemicals used for cooling tower.
PBR 148101	Authorized dispersant usage.

# Permit Numbers 1768, PSDTX1272, and N142M1

## Attachment A

## Approved Chemicals List

Tank	EPN	Material
TK-3455	34E12	Waste Caustic
TK-38008	38E008	Slop Oil
TK-38009	38E009	Wastewater
TK-38010	38E010	Wastewater
TK-38011	38E011	Wastewater
TK-38302	38E07	PGO
TK-38303	38E08	LCO
TK-3901	39E01	Olefins Feedstock, PGO, raw py-gas
TK-3902	39E02	Olefins Feedstock, PGO, raw py-gas
TK-3904	39E04	Olefins Feedstock, PGO, raw py-gas
TK-3905	39E05	Olefins Feedstock, PGO, raw py-gas
TK-3906	39E06	Olefins Feedstock, PGO, raw py-gas
TK-3907	39E07	Olefins Feedstock, PGO, raw py-gas
TK-3911	39E11	Raw PGO, raw pygas
TK-3912	39E12	Treated PGO, raw py-gas, LTPG, raw PGO
TK-3913	39E13	PFO, PGO
TK-3914	39E14	LCO
TK-3943	39E43	LCO

Date:	TBD	

# Permit Numbers 1768, PSDTX1272, and N142M1

## Attachment B

**Routine Maintenance Activities** 

Pump repair/replacement
Fugitive component (valve, pipe, flange) repair/replacement
Compressor repair/replacement
Heat exchanger repair/replacement
Process & Storage Vessel cleaning/repair/replacement
Date: TBD

# Permit Numbers 1768, PSDTX1272, and N142M1

# Attachment C

# MSS Activity Summary

Facilities	Description	Emissions Activity	EPN
F-3419 and ancillary piping	process unit purge/degas/drain	vent to atmosphere	ENMSSROUT
Flare MSS	Olefins 1 Flare MSS	MSS venting to Flare	38E01

Date: TBD

#### Emission Sources - Maximum Allowable Emission Rates

### Permit Numbers 1768, PSDTX1272, and N142M1

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

Air Contaminants Data

<b>Emission Point</b>	All Contaminal	Air Contaminant Name (3)	Emission Rates	
No. (1)	Source Name (2)		lbs/hour	TPY (4)
F24F00	OD4 5	VOC	74.84	323.31
F34E00	OP1 Fugitives (5)	NH <sub>3</sub>	0.12	0.53
34FGWATER	OP1 Wastewater Fugitives (5)	VOC	1.35	5.89
34FGWATER	OPT Wastewater Fugitives (5)	Acetone	<0.01	<0.01
EOP1FUGEXP	OP1 Fugitives (5)	VOC	0.46	2.01
EFUGNH3	OP1 NH3 Fugitives (5)	NH <sub>3</sub>	0.27	1.18
		СО	132.00	113.75
		PM	36.00	6.50
34E08	Decoke Vent	PM <sub>10</sub>	36.00	6.50
		PM <sub>2.5</sub>	36.00	6.50
		VOC	0.11	0.10
	Decoke Vent 2	со	310.00	59.60
		VOC	0.08	0.02
EOP1DECOKE2		РМ	1.07	0.10
		PM <sub>10</sub>	1.07	0.10
		PM <sub>2.5</sub>	1.07	0.10
		СО	3.56	1.02
34E10	Reactor Regeneration Vent	SO <sub>2</sub>	9.51	2.23
		VOC	1.38	0.17
		VOC	10.58	19.87
20544	OP1 Cooling Tower	РМ	6.62	29.00
38E11		PM <sub>10</sub>	3.31	14.50
		PM <sub>2.5</sub>	0.01	0.06
35E03	Seal Oil Reservoir Vent	VOC	0.01	0.01

Project Number: 309204

## Emission Sources - Maximum Allowable Emission Rates

35E04	Seal Oil Reservoir Vent	VOC	0.01	0.01
34PVD3420	Dilution Generator Vent	VOC	1.69	0.14
	Dilution Generator Vent	Acetone	0.05	<0.01
34STMFUG	Dilution Steam Vent	VOC	0.85	1.86
		Acetone	0.02	0.05
38HTF3804A/B	Superheater Vents	VOC	3.81	0.01
		NOx	494.93	2,022.33
		CO	395.03	1,612.25
	Pyrolysis and Steam Production	SO <sub>2</sub>	33.85	138.17
34HTHTRS	Common Stack Cracking Heaters: F-3401 - F-3415; F-3418; F-3419	PM	37.61	153.52
34111113	Common Stack Steam Super Heaters:	PM <sub>10</sub>	37.61	153.52
	F380001 A/B	PM <sub>2,5</sub>	37.61	153.52
		NH <sub>3</sub>	1.30	5.26
		VOC	24.98	99.18
	OP-1 Cracking Heater F-3419	NOx	38.40	25.71
		СО	33.88	148.38
		SO <sub>2</sub>	0.38	1.54
EF3419		PM	4.23	17.00
EF3419		PM <sub>10</sub>	4.23	17.00
		PM <sub>2.5</sub>	4.23	17.00
		NH <sub>3</sub>	2.69	11.78
		VOC	0.64	2.57
		NO <sub>x</sub>	2.50	2.63
		СО	2.06	1.95
		SO <sub>2</sub>	0.18	0.19
36E05	Regeneration Heater F-3601	PM	0.19	0.18
		PM <sub>10</sub>	0.19	0.18
		PM <sub>2.5</sub>	0.19	0.18
		VOC	0.13	0.12

Project Number: 309204

## Emission Sources - Maximum Allowable Emission Rates

37E03		NOx	2.45	10.74
		СО	2.06	9.02
		SO <sub>2</sub>	0.18	0.79
	Recycle Heater F-3701	PM	0.19	0.82
		PM <sub>10</sub>	0.19	0.82
		PM <sub>2.5</sub>	0.19	0.82
		voc	0.13	0.55
38E01	OPI Flare (6)	NOx	120.95	35.67
		СО	623.00	181.15
		SO <sub>2</sub>	25.03	9.39
		voc	1,377.22	53.45
38E3602	Shelter J-3602	voc	0.01	0.02
38E3603	Shelter J-3603	voc	0.08	0.34
38E3604	Shelter J-3604	voc	0.02	0.05
38E3605	Shelter J-3605	voc	0.01	0.01
38E3606	Shelter J-3606	voc	0.01	0.01
38E3904	Shelter J-3904	voc	1.28	5.62
		NOx	1.73	3.88
		со	3.02	6.80
	Diesel Engine Driven Air Compressor (7)	SO <sub>2</sub>	0.01	0.01
OP1EN1		PM	0.02	0.04
		PM <sub>10</sub>	0.02	0.04
		PM <sub>2.5</sub>	0.02	0.04
		VOC	0.16	0.37
39E03	Storage Tank 3903 (Wastewater/Storm Water)	voc	1.93	5.00
37E09	Antifoulant Storage Tank 3709	VOC	0.28	0.01
00507	De les Que O'I T. 1 00000	VOC	7.38	0.88
38E07	Pyrolysis Gas Oil Tank 38302	Benzene	0.05	0.01
38E08	Storage Tank 38303	VOC	2.07	0.23

Project Number: 309204

#### Emission Sources - Maximum Allowable Emission Rates

39E13	Pyrolysis Fuel Oil Tank 3913	VOC	11.58	8.06
39E14	Storage Tank 3914	VOC	2.37	1.95
39E43	Storage Tank 3943	VOC	2.37	3.64
		VOC	8.38	-
39E01	Storage Tank 3901	Benzene	2.56	-
		H₂S	0.01	-
		VOC	8.38	-
39E02	Storage Tank 3902	Benzene	2.56	-
		H₂S	0.01	-
		VOC	-	24.68
39E01 to 39E02	Storage Tanks (2 total)	Benzene	-	10.62
		H₂S	-	0.02
		VOC	5.45	-
39E04	Storage Tank 3904	Benzene	1.45	-
		H₂S	0.01	ı
		VOC	5.45	-
39E05	Storage Tank 3905	Benzene	1.45	-
		H2S	0.01	-
		VOC	5.81	ı
39E06	Storage Tank 3906	Benzene	1.54	ı
		H₂S	0.01	-
		VOC	5.81	1
39E07	Storage Tank 3907	Benzene	1.54	-
		H <sub>2</sub> S	0.01	-
		VOC	14.06	38.94
39E04-39E07	Storage Tanks (4 total)	Benzene	1.92	9.61
		H₂S	0.01	0.01
20511	Storage Tank 2011	VOC	2.27	6.84
39E11	Storage Tank 3911	Benzene	1.59	4.80

Project Number: 309204

#### Emission Sources - Maximum Allowable Emission Rates

20542	Storage Tank 2012	VOC	2.67	7.95
39E12	Storage Tank 3912	Benzene	1.87	5.56
OP1SMLT10	Antifoulant Tank 68423	VOC	0.32	0.01
34E12	Waste Caustic Tank 3455	VOC	0.51	1.62
38E008	Slop Oil Tank 38008	VOC	0.35	1.52
38E009	Wastewater Tank 38009	VOC	1.03	1.76
38E010	Wastewater Tank 38010	VOC	1.46	4.85
38E011	Wastewater Tank 38011	VOC	2.80	6.41
ENMSSROUT	MSS Vessel	VOC	4.37	0.05
EOP1ANALY	Analyzers	VOC	0.03	0.13
OP1PV38055	Analyzer Vent	VOC	0.08	0.35
38E3501A	OP-1 Analyzer	VOC	0.01	0.01

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2)	Specific point source nar	ne. For fugitive sources,	use area na	ime or fugitive source name.	
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(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

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

SO<sub>2</sub> - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented

PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as

represented

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

CO - carbon monoxide

HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of

Federal Regulations Part 63, Subpart C

H<sub>2</sub>S - hydrogen sulfide

NH<sub>3</sub> - ammonia

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

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

(6) These emission rates include routine (non-MSS) and MSS operations.

(7) The maximum annual operating schedule for EPN OP1EN1 is 4,500 hrs/yr.

Date:	TBD	

Project Number: 309204



November 8, 2019

Certified Mail #7016 0600 0000 3199 4419 EPERMITS 327950

Air Permits Review Division Air Permits Initial Review Team - MC 161 Texas Commission on Environmental Quality P.O. Box 13087 Austin, TX 78711-3087

Re: Equistar Chemicals, LP - Channelview Chemical Complex

TCEQ Air Quality Permits No. 1768 Permit Amendment Application Channelview, Texas Harris County

TCEQ Account ID No. HG-0033-B; RN100542281; CN600124705

Equistar Chemicals, LP (Equistar) operates an Olefins (OP1) Unit under Texas Commission on Environmental Quality (TCEQ) Air Quality Permit No. 1768. Equistar requests the amendment of this permit to update emissions from the Unit Flare.

A hard copy with the original signature of the NSR Workbook General sheet, as well, as, copies of the supporting documentation submitted through STEERS is included in this document. Required TCEQ Forms in the NSR Workbook and air dispersion modeling documentation in the EMEW Workbook have been submitted electronically. Relevant documents including emissions details, process description, flow diagrams, BACT and/or LAER analysis, area map, plot plan are included in this application submittal to assist in TCEQ's review. Equistar is requesting this application review be expedited and is sending the Surcharge Form under separate cover letter to the Cashier's Office. The amendment application fees are sent via wire transfer. If you have any questions regarding this application submittal, please contact Teresa Peneguy at (281) 452-8330.

Sincerely,

Tom Warnement

Environmental Team Leader - Air

Enclosure

cc:

Director

Harris County Pollution Control Services

101 South Richey, Suite H

Pasadena, TX 77506

Certified Mail #7016 0600 0000 3199 4402

TCEQ Region 12

submitted via STEERS

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U.S. EPA

R6AirPermitsTX@EPA.gov

Equistar Chemicals, LP 8280 Sheldon Road Channelview, TX 77530 P.O. Box 777 (77530-0777) Tel +1 281 862 4000 lyb.com

### NEW SOURCE REVIEW PERMIT AMENDMENT APPLICATION

Permit No. 1768

**Submitted by:** 

Equistar Chemicals, L.P. - Channelview

TCEQ Account Number HG-0033-B

#### **Submitted to:**

Texas Commission on Environmental Quality (TCEQ)
Air Permits Initial Review Team (APIRT)
Air Permits Division, MC-161
P.O. Box 13087
Austin, Texas 78711-3087

November 2019

### TABLE OF CONTENTS

SECTIO	N 1 Introduction	1-1
1.1	Purpose	1-1
1.2		
1.3	Facility Information	
1.4	•	
1.5	Application Contents	1-3
SECTIO	N 2 Process Description	2-1
2.1	Process Description	2-1
SECTIO	N 3 Emission Calculation Methodology	3-1
3.1	Flare Emissions	3-1
3.2	Fugitive Emissions	3-1
3.3	Heater Emissions	3-1
3.4	Engine Emissions.	3-2
SECTIO	N 4 Best Available Control Technology and LOWEST ACHIEVAR	BLE
EM	IISSION REDUCTION	4-1
4.1	Fugitives	4-1
4.2	Flare	4-1
SECTIO	N 5 Regulatory Applicability	5-1
5.1	General Application Requirements - §116.111	5-1
LIST OF	FIGURES	
	1 Area Map	1-4
•	2 Plot Plan	
•	1 OP1 Unit Process Flow Diagram	
LIST OF	APPENDICES	
Appendix	A Administrative Considerations and Application Forms	
Appendix	x B Technical Application Tables	
Appendix	C Emission Calculations	
Appendix	x D PBR and Standard permit Approval Letter	

Equistar Chemicals, L.P. (Equistar) operates a Olefins Production (OP1) Unit under Texas Commission on Environmental Quality (TCEQ) Air Quality Permit No. 1768.

#### 1.1 Purpose

Equistar requests the amend Air Quality Permit No. 1768, and is submitting this application as required under 30 TAC 116.111. Equistar is modifying the operation of the existing flare to meet future regulatory requirements. Additional natural gas is required to meet the anticipated operating limit to maintain a net heating value of the flare combustion zone gas (NHVcz) at or above 270 British thermal units per standard cubic feet (Btu/scf). The site anticipates future requirements for the combustion zone that match the limits currently identified in 40 CFR 63 Subpart CC. No changes to the operation of the process unit or process vent controlled by the flare are being made with this project. All increases of volatile organic compounds (VOC) emissions will result from the minimal non-methane and nonethane organics present in the imported natural gas supply. Additionally, the application identifies the sulfur dioxide (SO2) increases resulting from the minimal sulfur present in the natural gas. The combustion products oxides of nitrogen (NOx) and carbon monoxide (CO) that will be generated from the combustion of the additional natural gas are included in the emissions calculations.

The calculations and representations used in this permit amendment are based on best available estimates and should not be considered absolute values for all operating scenarios.

#### **1.2** Permit History

Equistar currently operates the OP1 Unit at their Channelview, Texas manufacturing complex under TCEQ Air Permit No. 1768.

The permit was initially issued in September 1979 for the unit. The permit was last renewed on December 28, 2018.

#### 1.3 Facility Information

The project described in this application includes emissions related to the Olefins 1 Production unit at the Equistar Channelview Facility. The regulated entity number for the facility is RN100542281. The Channelview Facility includes multiple process units; however, only the OP1 Unit is affected by this amendment. The Equistar Channelview Facility is located on Sheldon Road, Channelview, TX. All units operate under a single Federal Operating Permit, Permit No. O1426.

Figure 1.1 shows the location of the Channelview Facility on the Area Map. A detailed plot plan of the Facility showing the estimated locations of emissions units at the site is also provided in Figure 1.2.

#### 1.4 PSD and Non-attainment Review

The Prevention of Significant Deterioration (PSD) regulations define a "major modification" as a physical change or a change in the method of operation of a major stationary source that would result in a significant emissions increase and a contemporaneous significant net emissions increase of any regulated pollutant. The project is not a major modification and is not subject to PSD or Non-attainment review for VOC, Carbon Monoxide CO, or Green House Gases (GHG). The project is a major modification for NOx and the associated Table 2F is included in Appendix A.

Table 1-1 PSD and NNSR Review

Contaminants	Emissions Increases	PSD Applicability			ttainment icability
		Limit	Netting?	Limit	Netting?
VOC	4.30	40	No	5	No
SO2	5.59	40	No		
CO	99.79	100	No		
NOx	19.37	40	No	5	Yes

#### 1.5 Application Contents

Key components of this application are organized as follows:

- An area map and a plot plan are provided at the end of Section 1.
- > A process description and process flow diagram are included in Section 2.
- Emissions calculations methodologies are included in Section 3.
- ➤ Best Available Control Technology (BACT) and Lowest Achievable Emissions Limit (LAER) are addressed in Section 4.
- > Regulatory applicability and compliance strategies are addressed in Section 5.
- Appendix A contains completed TCEQ administrative forms, PI-1 signature page from the NSR Workbook and the Expedited Permit Request Form APD-EXP
- > Appendix B contains TCEQ Table 2F Project Emissions Increases.
- > Appendix C contains emission rate calculations for all Emissions Points.
- > Appendix D contains the TCEQ approval letter for the Registered PBRs.

Figure 1-1 Area Map

Figure 1-1 Area Map Equistar Chemicals, L.P. - Channelview

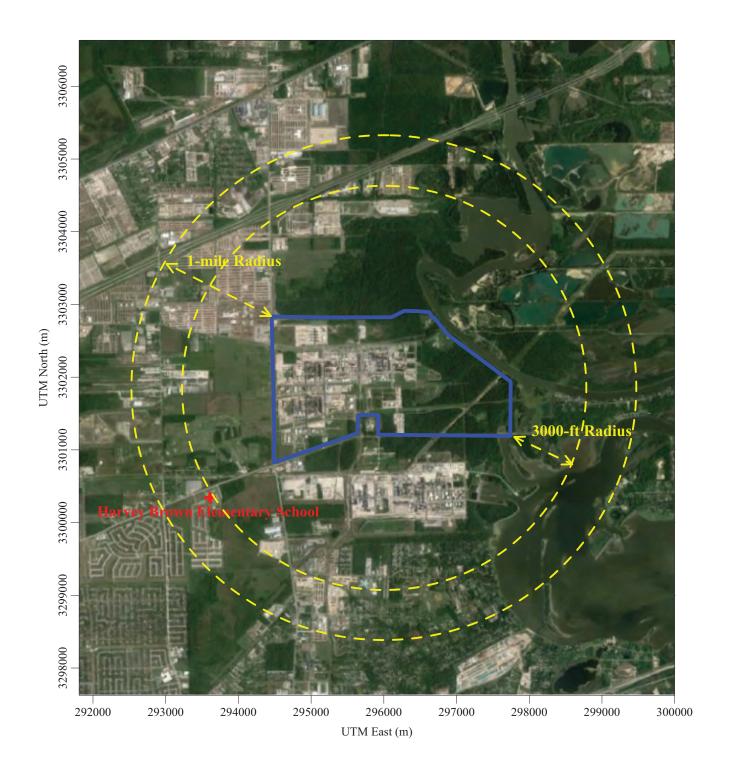
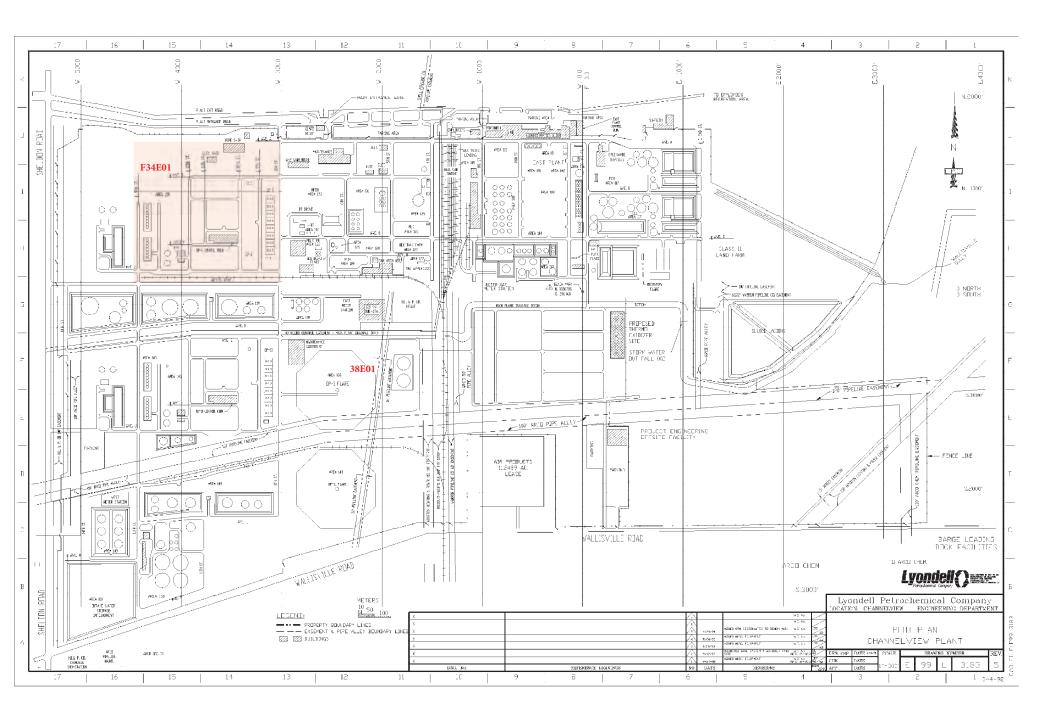


Figure 1-2 Plot Plan





### SECTION 2 PROCESS DESCRIPTION

#### 2.1 Process Description

The OP1 Unit consists of cracking furnaces, where pyrolysis (cracking by heat) occurs, fractionation equipment to separate and purify the raw products, catalytic reactors to convert some by-products, heat exchangers to control process temperatures and provide energy efficiency, liquid pumps and gaseous compressors. Additionally, there is utility equipment to support utilities to the olefins process operations.

Cracking & Quench (C&Q) is the front-end of the unit where feedstock is cracked into smaller chain molecules, and initial fractions are produced. The cracking furnaces (EPNs: 34HTHRTRS, EF3419) accommodate a variety of feed stocks. Liquid feeds to the cracking furnaces are generally pumped into tankage (EPNs: 39E01 – 39E07) and then routed to the cracking furnaces. Natural gas liquids can be fed directly to the furnaces from pipelines. The effluent from the cracking furnaces is directed through heat exchangers to halt the reactions and recovery energy. The stream, generally referred to as cracked gas, is then directed to the compression and fractionation step.

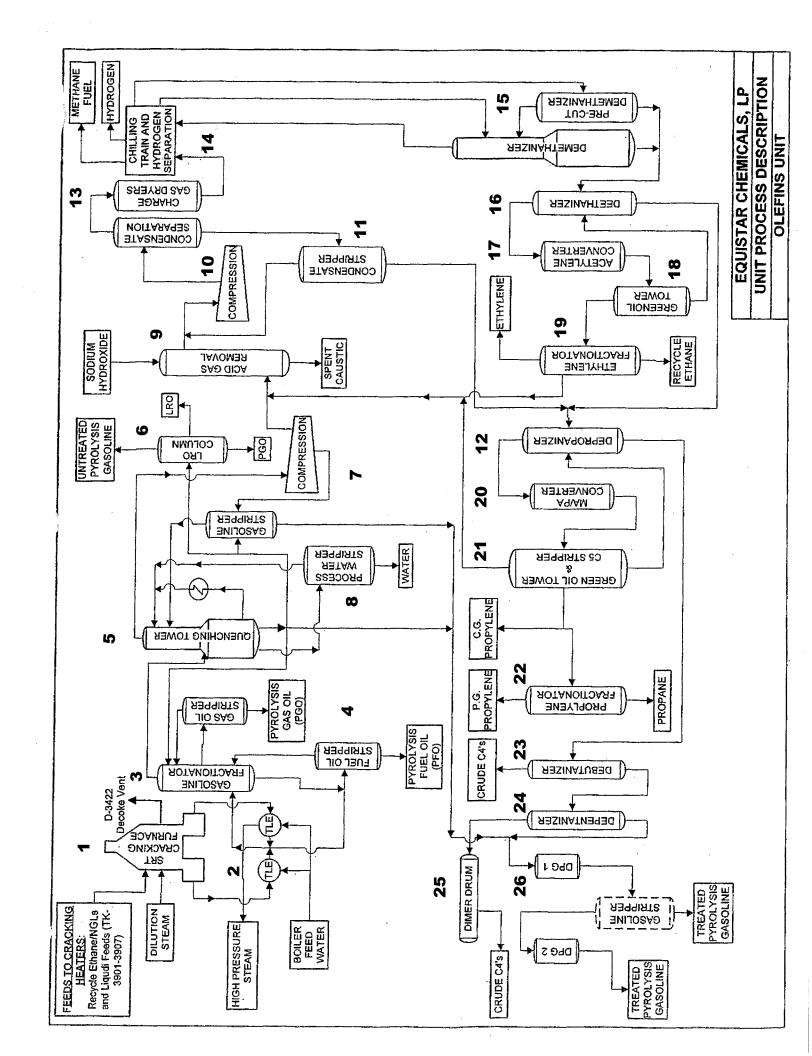
The cracked gas then goes through a series of compression and fractionation steps where the primary products, ethylene and propylene are separated from the by-products. The by-products are also fractionated into several different by-product streams, such as ethane, propane, C4 products, C5 products, pyrolysis fuel oil, pyrolysis gasoline and other higher carbon hydrocarbons. Methane and hydrogen removed from the cracked gas is used as fuel gas for the fired sources within the unit. Acetylene in the cracked gas is converted to ethylene and ethane in the Acetylene converters and methyl acetylene/propadiene (MAPD) in the cracked gas is converted to propylene and propane in the MAPD converters.

The DPG equipment processes pyrolysis gasoline feed. In the DPG equipment, the di-olefins are converted to mono-olefins. The effluent from these reactors is sent to other units at the site for further fractionated into light and heavy gasoline fractions.

The Acetylene, MAPD and DPG converters are regenerated through a common stack (The converters (EPN: 34E10) are regenerated using the Regen Heater (EPN: 37E03).

Process water is used as steam within the unit (EPNs: 34PVD3420 and 34FUGSTM). Purchased steam is also used within the unit and superheated using the Superheaters (F380001 A/B). Cooling water is supplied by a closed look system between the Cooling Tower (EPN: 38E11) and heat exchangers.

### Figure 2-1 OP1 Unit Process Flow Diagram



### SECTION 3 EMISSION CALCULATION METHODOLOGY

This section describes the methodology used to calculate Potential-to-Emit (PTE) emissions from the sources affected by this project using BACT level controls. Emissions calculations are being provided electronically per TCEQ guidance.

#### 3.1 Flare Emissions

The VOC emissions are estimated based on natural gas flow and the emission factor in EPA AP-42 for the combustion of natural gas. The flare is designed to ensure that the flares maintain compliance with NSR Permit No. 1768 and with applicable NSPS and State regulations when in use. NOx and CO emissions are estimated using emissions factors provided in TCEQ publication RG-360A/11, Appendix A: Technical Supplement, Table A-6, "Air Permit Flare Emissions Factors," revised February 2012. The unit operates a steam-assist flare to control vents from the process unit.

#### 3.2 Fugitive Emissions

The TCEQ 28VHP & 28LAER fugitive emissions monitoring programs are used to control fugitive emissions from the OP1 Unit. The fugitive emissions from equipment included in the PBR being incorporated with this application have been estimated using the 28VHP program control efficiencies. Additionally, a control efficiency of 75% is used for connectors that are monitored annually, and a control efficiency of 97% is used for connectors that are monitored quarterly. The affected process unit contains streams various concentration of ethylene, therefore SOCMI without ethylene factors, SOCMI with ethylene factors, and SOCMI average ethylene factors were used in the fugitive emission estimation calculations. Emissions were calculated per the TCEQ "Technical Guidance Package for Chemical Sources: Equipment Leak Fugitives", issued October 2000.

#### 3.3 Heater Emissions

The project authorized via standard permit being incorporated with this application did not change the fuel source or speciation. The project only lowered the rated heat duty of the heater through burner changes.

The estimated Carbon Monoxide (CO) emissions are the sum of the CO generated from combustion reaction and uncombusted CO within the fuel stream. The CO and NOx emissions from the combustion are calculated based on AP-42 factors for Large Wall-Fired Boilers (firing rate > 100 MMBtu/hr) listed under Section 1.4, "Natural Gas Combustion", Table 1.4-1 Emission Factors for Nitrogen Oxides (NOx) and Carbon Monoxide (CO) from Natural Gas Combustion. The CO within the fuel stream is calculated based on weight percentage obtained from sampling of the fuel gas. Other factors used to calculate emissions are molecular weight, firing rate, fuel net heating value, and number of hours in service.

The estimated SO2, PM, and VOC emissions are based on AP-42 factors listed under Section 1.4, "Natural Gas Combustion", Table 1.4-2 Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion. Other factors used to calculate emissions are firing rate, fuel net heating value, and number of hours in service.

#### 3.4 Engine Emissions

Engine emissions are calculated based on manufacturers' and tests' data. The guaranteed maximum emission rate limit in grams of pollutant per brake horsepower hour (g/bhp-hr) and the total hours of operation are used to calculate the emissions. Equation is derived from TCEQ Air Permit Division Document, "New Source Review (NSR) Emission Calculations".

#### **SECTION 4**

### BEST AVAILABLE CONTROL TECHNOLOGY AND LOWEST ACHIEVABLE EMISSION REDUCTION

In accordance with 30 TAC Chapter 116, §116.111(a)(2)(C), any new or modified facility must utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the facility. Below is a BACT and LAER evaluation of the OP1 Unit projects that were a modification per 30 TAC 101.

#### 4.1 Fugitives

The unit complies with the 28VHP program for the fugitive components. 28VHP meets the requirements for BACT.

#### 4.2 Flare

The flare meets at least 98% destruction efficiency (DRE) for organic compounds and 99% DRE for organic compounds with 3 carbon or less, which meets BACT. The emission factors for NOx and CO emissions from a steam-assisted flare were used and meet BACT for CO and LAER for NOx. The EPA RACT/BACT/LAER Clearinghouse identified LAER for NOx to be operating flare with good combustion practices in compliance with 40 CFR 60.18 and/or 40 CFR 63.11. The TCEQ published 0.068 lb/MMBtu NOx factor for low BTU steam-assisted flares was the lowest reported emission factor for an elevated flare during the last 10 years. A copy of the results of the Clearinghouse search is attached.

### SECTION 5 REGULATORY APPLICABILITY

Pursuant to TCEQ 30 TAC §116.111, Equistar will meet all rules and regulations of the TCEQ and the intent of the TCAA for the emission sources and activities addressed in this permit amendment application, as follows:

- ➤ §116.111(a)(1) A completed Form PI-1 has been signed by an authorized representative of Equistar and is included in Appendix A.
- $\gt$  §116.111(a)(2)(A) through (L) These items are addressed individually below.
- > §116.111(b) Equistar will comply with applicable 30 TAC 39 and 30 TAC 55 public notice and public participation requirements for this permit amendment application.

#### 5.1 General Application Requirements - §116.111

The emissions associated with the proposed OP1 Unit project will comply with all applicable air quality rules and regulations and with the intent of the TCAA, including protection of the health and the physical property of people, as required by §116.111(a)(2)(A)(i). Following is a summary of rules and regulations as they apply to the proposed project:

<u>30 TAC 101 - General Rules</u>: The facility will be operated in accordance with the General Rules relating to circumvention, nuisance, traffic hazard, notification requirements for major upset, notification requirements for unplanned maintenance, sampling, sampling ports, emission inventory requirements, sampling procedures and terminology, compliance with Environmental Protection Agency (EPA) Standards, emissions fees, and all other applicable General Rules.

- <u>30 TAC 111 Visible Emissions and Particulate Matter</u>: Equistar will comply with all applicable requirements under this chapter.
- <u>30 TAC 112 Sulfur Compounds</u>: Equistar will comply with all applicable requirements under this chapter.
- <u>30 TAC 113 Toxic Materials</u>: TCEQ has incorporated MACT standards (40 CFR 63) into Chapter 113 by reference. The proposed facility will comply with all applicable provisions of Chapter 113 concerning control, recordkeeping, reporting, and monitoring requirements.
- <u>30 TAC 114 Motor Vehicles</u>: This provision of the rule controls the emissions from motor vehicles and does not apply to the facilities under consideration in this permit application.
- <u>30 TAC 115 Volatile Organic Compounds</u>: The proposed facility is located in Harris County and is regulated by the following Rules that are applicable to this permit application:

Subchapter B Division 2 – Vent Gas Control

Equistar will comply with all the applicable control, monitoring, testing, and recordkeeping requirements listed in this subchapter.

#### <u>Subchapter D Division 3 - Fugitive Emission Control in Petrochemical Process in Ozone</u> Nonattainment Areas

Equistar will comply with all the applicable control, monitoring, inspection, and recordkeeping requirements listed in this subchapter

<u>30 TAC 116 - Permits for New Construction or Modification</u>: Equistar is complying with the requirements of Chapter 116 by submitting this permit application and as outlined below for each of the following sections:

#### Rule 116.111(a)(2)(A) Protection of public health and welfare

As outlined below, the emissions from Equistar will comply with all air quality rules and regulations and with the intent of the TCAA, including protection of the health and physical property of the people.

#### Rule 116.111(a)(2)(B) Measurement of Emissions

The proposed facility will have provisions for measuring the emission of significant air contaminants as determined by the Executive Director.

#### Rule 116.111(a)(2)(C) Best Available Control Technology (BACT)

Section 4 of this application presents a discussion of BACT for the modified facilities associated with this application.

#### Rule 116.111(a)(2)(D) Federal New Source Performance Standards (NSPS)

Equistar will comply with all applicable 40 CFR Part 60 controls, recordkeeping, reporting, and monitoring requirements.

#### Rule 116.111(a)(2)(E) National Emission Standards for HAPs (NESHAP)

Equistar will comply with all applicable 40 CFR Part 61 controls, recordkeeping, reporting, and monitoring requirements.

#### Rule 116.111(a)(2)(F) Maximum Achievable Control Technology (MACT)

Equistar will comply with all applicable 40 CFR Part 63 controls, recordkeeping, reporting, and monitoring requirements.

#### Rule 116.111(a)(2)(G) Performance Demonstration

The proposed facilities are expected to perform as represented in this application.

#### Rule 116.111(a)(2)(H) Nonattainment Review

The facility is located in a nonattainment area for VOC and NO<sub>x</sub>. See Section 1.4, PSD and Non-attainment Review, for details.

#### Rule 116.111(a)(2)(I) Prevention of Significant Deterioration (PSD) review

The facility is located in an attainment area for SO2, PM10, CO, and lead.

See Section 1.4, PSD and Non-attainment Review, for details.

#### Rule 116.111(a)(2)(J) Air Dispersion Modeling

Air dispersion modeling is being submitted with this application.

#### Rule 116.111(a)(2)(K) Hazardous Air Pollutants

Equistar will comply with all applicable requirements under Subchapter E of this chapter.

#### Rule 116. 111(a)(2)(L) Mass Cap and Trade Allowances

Equistar Channelview Facility is located in the Houston/Galveston/Brazoria area. Equistar has sufficient NOx allowances to demonstrate compliance with the mass emissions cap and trade program.

<u>30 TAC 117 - Nitrogen Compounds</u>: The provision of the rule does not apply to the proposed facilities considered in this permit application.

<u>30 TAC 118 - Air Pollution Episodes</u>: The facility will be operated in compliance with the rules relating to generalize a localized air pollution episode. An Emissions Reduction Plan is maintained as required by §118.5.

<u>30 TAC 122 - Federal Operating Permits:</u> The Channelview Facility operates under Federal Operating Permit No. O1426. The Title V Permit will be revised to reference the changes in applicable requirements resulting from the amendment to the NSR permit.

# APPENDIX A ADMINISTRATIVE CONSIDERATIONS AND APPLICATION FORMS

#### **Permit Fee Calculation**

The amendment application fee is calculated according to 30 TAC §116.141(a), Determination of Fees, which specifies that the fee for an amendment is based on the capital cost of the project. The permit application fee is calculated and summarized on the TCEQ Table 30 included in the NSR Workbook.

The permit amendment fee of \$3,000 is provided with this application. The fee payment tracer number for the total amount including both fees is included in this appendix.

#### **Compliance History**

Equistar is an existing site greater than 5-years old. Equistar requests that TCEQ compile the history of the site.

#### **Administratively Application Forms**

The administrative information has been completed in the NSR Workbook and sent electronically to the Air Permit Initial Review Team. Additional the project EMEW for SCREEN workbook containing the modeling review information has been provided electronically.

Date: 10/01/2019
Permit #: 1768
Company: Equistar

I. Applicant Information					
I acknowledge that I am submitting an authorized TCEQ application workbook and any					
necessary attachments. Except	necessary attachments. Except for inputting the requested data and adjusting row height and				
column width, I have not chang	column width, I have not changed the TCEQ application workbook in any way, including but				
not limited to changing formula	is, formatting, co	ntent, or protections.			
A. Company Information					
Company or Legal Name:		Equistar Chemicals, LP			
Permits are issued to either the fa	acility owner or ope	erator, commonly referred to as th	ne applicant or pe	ermit holder. List	
the legal name of the company, c	orporation, partne	rship, or person who is applying for	or the permit. We	will verify the	
legal name with the Texas Secret	ary of State at (51	2) 463-5555 or at:			
https://www.sos.state.tx.us					
Texas Secretary of State Charter	/Registration				
Number (if given):					
B. Company Official Contact In	<b>formation:</b> must r	not be a consultant			
Prefix (Mr., Ms., Dr., etc.):	Mrs.				
First Name:	Kim				
Last Name:	Foley				
Title:	Site Manager				
Mailing Address:	PO Box 777				
Address Line 2:					
City:	Channelview				
State:	Texas				
ZIP Code:	77530				
Telephone Number:	281-862-5150				
Fax Number:					
Email Address:	kim.foley@lyb.c				
C. Technical Contact Information					
representations on behalf of the a	applicant and may	be a consultant. Additional tech	nical contact(s)	can be	
provided in a cover letter.	_				
Prefix (Mr., Ms., Dr., etc.):	Mrs.				
First Name:	Teresa				
Last Name:	Peneguy				
Title:	Environmental F	Permitting			
Company or Legal Name:	LyondellBasell				
Mailing Address:	PO Box 777				
Address Line 2:					
City:	Channelview				
State:	Texas				
ZIP Code:	77503				
Telephone Number:	281-452-8330				
Fax Number:					
Email Address: teresa.peneguy@lyb.com					
D. Assigned Numbers					
The CN and RN below are assigned when a Core Data Form is initially submitted to the Central Registry. The RN is					
also assigned if the agency has conducted an investigation or if the agency has issued an enforcement action. If					
these numbers have not yet been assigned, leave these questions blank and include a Core Data Form with your					
application submittal. See Section VI.B. below for additional information.					
Enter the CN. The CN is a unique	-	_			
body, association, individual, or other entity that owns, operates, is responsible for,  600124705					

Version 4.0 Page 1

or is affiliated with a regulated entity.

Date: \_\_10/01/2019\_ Permit #: \_\_\_1768\_ Company: \_\_Equistar\_

Enter the RN. The RN is a unique agency assigned number given to each person, organization, place, or thing that is of environmental interest to us and where regulated activities will occur. The RN replaces existing air account numbers. The RN for portable units is assigned to the unit itself, and that same RN should be used when applying for authorization at a different location.

100542281

#### II. Delinquent Fees and Penalties

Does the applicant have unpaid delinquent fees and/or penalties owed to the TCEQ? This form will not be processed until all delinquent fees and/or penalties owed to 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. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at:

No

https://www.tceq.texas.gov/agency/financial/fees/delin

#### **III. Permit Information**

#### A. Permit and Action Type (multiple may be selected, leave no blanks)

Additional information regarding the different NSR authorizations can be found at: <a href="https://www.tceq.texas.gov/permitting/air/guidance/authorize.html">https://www.tceq.texas.gov/permitting/air/guidance/authorize.html</a>

Select from the drop-down the type of action being requested for each permit type. If that permit type does not apply, you MUST select "Not applicable".

Provide all assigned permit numbers relevant for the project. Leave blank if the permit number has not yet been assigned.

Permit Type	Action Type Requested (do not leave blank)	Permit Number (if assigned)
Minor NSR (can be a Title V major source): Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction		1768
Special Permit: Not applicable, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction	Not applicable	
De Minimis: <i>Not applicable, Initial</i>	Not applicable	
Flexible: Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction	Not applicable	
PSD: Not applicable, Initial, Major Modification	Not applicable	
Nonattainment: <i>Not applicable, Initial, Major</i> <i>Modification</i>	Major Modification	N142
HAP Major Source [FCAA § 112(g)]: <i>Not</i> applicable, <i>Initial, Major Modification</i>	Not applicable	
PAL: Not applicable, Initial, Amendment, Renewal, Renewal/Amendment, Alteration	Not applicable	
GHG PSD: Not applicable, Initial, Major Modification, Voluntary Update	Not applicable	

Date: <u>10/01/2019</u>
Permit #: <u>1768</u>
Company: <u>Equistar</u>

B. MSS Activities			
How are/will MSS activities for sources associated with this project be authorized?	Combination (lis	t below)	
List the permit number, registration number, and/or PBR number.		83799, 106.263	
C. Consolidating NSR Permits			
Will this permit be consolidated into another NSR p	ermit with this ac	tion?	No
			T
Will NSR permits be consolidated into this permit w	rith this action?		No
D. Incorporation of Standard Permits, Standard	Exemptions, an	d/or Permits By Rule (PBR)	
To ensure protectiveness, previously issued author	izations (standar	d permits, standard exemptions,	
including those for MSS, are incorporated into a pe			
and/or amendment, consolidation (in some cases) regarding incorporation can be found in 30 TAC § 1			
regarding incorporation can be found in 50 1760 g 1	10.110(a)(2), 30	170 g 110.010(5) and in this me	,,,,,,
https://www.tceq.texas.gov/assets/public/permitting	/air/memos/pbr	spc06.pdf	
Are there any standard permits, standard exemption	ns, or PBRs to	No	
be incorporated by reference?			
Are there any PBR, standard exemptions, or standa	•		
associated to be incorporated by consolidation? No			
calculations, a BACT analysis, and an impacts analysis must be		Yes	
attached to this application at the time of submittal authorization to be incorporated by consolidation.	ior arry		
If yes, list any PBR, standard exemptions, or standard	ard permits that		
need to be consolidated:		157688, 157139, 156142	
If yes, are emission calculations, BACT analysis, ar	•		
analysis included for each authorization to be conso	-	Yes	
required information is not provided, the author incorporated by reference.	ization will be		
E. Associated Federal Operating Permits			
IL. ASSOCIATED FEDERAL OPERALING PERMITS			

Date: _	<u> 10/01/2019</u>
Permit #:	<u>1768</u>
Company:	Equistar

	General	Company: <u>Equi</u>
Is this facility located at a site required to obtain a soperating permit (GOP)?	site operating permit (SOP) or general	Yes
Is a SOP or GOP review pending for this source, a	rea, or site?	Yes
If required to obtain a <b>SOP</b> or <b>GOP</b> , list all associated permit number(s). If no associated permit number has been assigned yet, enter "TBD":	O1426	
	ation and General Information	
A. Location		
County: Enter the county where the facility is physically located.	Harris	
TCEQ Region	Region 12	
County attainment status as of Sept. 23, 2019	Serious Ozone nonattainment	
Street Address:	8280 Sheldon Road	
City: If the address is not located in a city, then enter the city or town closest to the facility, even if it is not in the same county as the facility.	Channelview	
ZIP Code: Include the ZIP Code of the physical facility site, not the ZIP Code of the applicant's mailing address.	77530	
Site Location Description: If there is no street address, provide written driving directions to the site. Identify the location by distance and direction from well-known landmarks such as major highway intersections.		
Use USGS maps, county maps prepared by the Te application such as Google Earth to find the latitude	·	oftware
Latitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Latitude is the angular distance of a location north of the equator and will always be between 25 and 37 degrees north (N) in Texas.	029:49:56	
Longitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions.  Longitude is the angular distance of a location west of the prime meridian and will always be between 93 and 107 degrees west (W) in Texas.	095:06:43	
Is this a project for a lead smelter, concrete crushir facility?	ng facility, and/or a hazardous waste managemen	t No
P. Canaval Information		
B. General Information Site Name:	Channelview Facility	
Area Name: Must indicate the general type of	Charmetriew Facility	

Site Name:	Channelview Facility
Area Name: Must indicate the general type of operation, process, equipment or facility. Include numerical designations, if appropriate. Examples are Sulfuric Acid Plant and No. 5 Steam Boiler. Vague names such as Chemical Plant are not acceptable.	Olefins Unit

Date: <u>10/01/2019</u>
Permit #: <u>1768</u>
Company: <u>Equistar</u>

Are there any schools located with the site boundary?	in 3,000 feet of	Yes				
C. Portable Facility						
Permanent or portable facility?		Permanent				
D. In december Trans						
D. Industry Type		SOCMI Chemicals				
Principal Company Product/Busine A list of SIC codes can be found at		SOCIVII CHEMICAIS				
https://www.naics.com/sic-codes-ir		ı				
Principal SIC code:	idusti y-di ilidowii	<u>/</u>  2869				
NAICS codes and conversions bet	Ween NAICS and					
https://www.census.gov/eos/www/r		d Old Codes are available at.				
Principal NAICS code:	<u>Idio3/</u>	325199				
E. State Senator and Representa	tive for this site					
		is not compatible to Internet Explorer):	_			
https://wrm.capitol.texas.gov/						
State Senator:		John Whitmire				
District:		15				
State Representative:		Ana Hernandez				
District:		143				
	V. F	Project Information				
A. Description						
Provide a brief description of the						
project that is requested. (Limited	Natural gas is b	eing added to flare to meet furture regulatory fl	ame zone heat			
to 500 characters).	value requireme		aille Zolle lleat			
	value requireme	The for fidings.				
B. Project Timing						
		before beginning construction. Construction is b				
as anything other than site clearan	ce or site prepar	ration. Enter the date as "Month Date, Year" (e.	g. July 4, 1776).			
	TDD					
Projected Start of Construction:	TBD					
Projected Start of Operation:	TBD					
C. Enforcement Projects	r rolated to an a	agonov investigation, nation of violation, or				
enforcement action?	i relateu to, an a	agency investigation, notice of violation, or	No			
emoreement action:						
D. Operating Schedule						
Will sources in this project be authorized	orized to operate	e 8760 hours per vear?	Yes			
The second of th	5 <u>.</u> _5 a to 5po. a.t.	The state of the s	1 00			

### VI. Application Materials

All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. (30 TAC § 116.116)

#### A. Confidential Application Materials

Date: 10/01/2019
Permit #: 1768
Company: Equistar

Is confidential information submitted with this application?	No
B. Is the Core Data Form (Form 10400) attached?  https://www.tceq.texas.gov/assets/public/permitting/centralregistry/10400.docx	No
C. Is a current area map attached?	Yes
Is the area map a current map with a true north arrow, an accurate scale, the entire plant property, the location of the property relative to prominent geographical features including, but not limited to, highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, hospitals, day care centers, and churches?	Yes
Does the map show a 3,000-foot radius from the property boundary?	Yes
D. Is a plot plan attached?	Yes
Does your plot plan clearly show a north arrow, an accurate scale, all property lines, all emission points, buildings, tanks, process vessels, other process equipment, and two bench mark locations?	Yes
Does your plot plan identify all emission points on the affected property, including all emission points authorized by other air authorizations, construction permits, PBRs, special permits, and standard permits?	Yes
Did you include a table of emission points indicating the authorization type and authorization identifier, such as a permit number, registration number, or rule citation under which each emission point is currently authorized?	Yes
E. Is a process flow diagram attached?	Yes
Is the process flow diagram sufficiently descriptive so the permit reviewer can determine the raw materials to be used in the process; all major processing steps and major equipment items; individual emission points associated with each process step; the location and identification of all emission abatement devices; and the location and identification of all waste streams (including wastewater streams that may have associated air emissions)?	Yes
F. Is a process description attached?	Yes
Does the process description emphasize where the emissions are generated, why the emissions must be generated, what air pollution controls are used (including process design features that minimize emissions), and where the emissions enter the atmosphere?	Yes
Does the process description also explain how the facility or facilities will be operating when the maximum possible emissions are produced?	Yes
G. Are detailed calculations attached? Calculations must be provided for each source with new or changing emission rates. For example, a new source, changing emission factors, decreasing emissions, consolidated sources, etc. You do not need to submit calculations for sources which are not changing emission rates with this project. Please note: the preferred format is an electronic workbook (such as Excel) with all formulas viewable for review. It can be emailed with the submittal of this application workbook.	N/A
H. Is a material balance (Table 2, Form 10155) attached?	Yes

Date: 10/01/2019
Permit #: 1768
Company: Equistar

I. Applicant Information							
I acknowledge that I am submitting an authorized TCEQ application workbook and any							
necessary attachments. Except for inputting the requested data and adjusting row height and							
column width, I have not changed the TCEQ application workbook in any way, including but							
not limited to changing formulas, formatting, content, or protections.							
A. Company Information							
Company or Legal Name: Equistar Chemicals, LP							
Permits are issued to either the fa	cility owner or ope	erator, commonly referred to as th	e applicant or per	mit holder. List			
the legal name of the company, co legal name with the Texas Secreta	orporation, partner	ship, or person who is applying fo					
https://www.sos.state.tx.us	`	•					
Texas Secretary of State Charter/	Registration						
Number (if given):							
B. Company Official Contact Info	ormation: must n	ot be a consultant					
Prefix (Mr., Ms., Dr., etc.):	Mrs.						
First Name:	Kim						
Last Name:	Foley						
Title:	Site Manager						
Mailing Address:	PO Box 777						
Address Line 2:	I O BOX III						
City:	Channelview						
State:	Texas						
ZIP Code:	77530						
Telephone Number:		281-862-5150					
Tax Number:							
Email Address:	kim.foley@lyb.co	om					
C. Technical Contact Informatio			ding agreements	and			
representations on behalf of the a							
in a cover letter.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			, , , , , , , , , , , , , , , , , , ,			
Prefix (Mr., Ms., Dr., etc.):	Mrs.						
First Name:	Teresa						
Last Name:							
Title:	Environmental F	Permittina					
Company or Legal Name:	LyondellBasell	3					
Mailing Address:	PO Box 777						
Address Line 2:							
City:	Channelview						
State:	Texas						
ZIP Code:	77503						
Telephone Number:	281-452-8330						
Fax Number:							
Email Address:	teresa.peneguy(	@lvb.com					
D. Assigned Numbers		<u></u>					
The CN and RN below are assigned	ed when a Core D	ata Form is initially submitted to t	he Central Regist	rv. The RN is			
also assigned if the agency has conducted an investigation or if the agency has issued an enforcement action. If these							
numbers have not yet been assigr							
submittal. See Section VI.B. below for additional information.							
Enter the CN. The CN is a unique number given to each business, governmental							
body, association, individual, or ot	_	<del>-</del>	600124705				

Version 4.0 Page 1

or is affiliated with a regulated entity.

Date: 10/01/2019
Permit #: 1768
Company: Equistar

I. Is a list of MSS activities attached?	N/A
J. Is a discussion of state regulatory requirements attached, addressing 30 TAC Chapters 101, 111, 112, 113, 115, and 117?	Yes
For all applicable chapters, does the discussion include how the facility will comply with the requirements of the chapter?	Yes
For all not applicable chapters, does the discussion include why the chapter is not applicable?	Yes
K. Are all other required tables, calculations, and descriptions attached?	Yes

#### VII. Signature

The owner or operator of the facility must apply for authority to construct. The appropriate company official (owner, plant manager, president, vice president, or environmental director) must sign all copies of the application. The applicant's consultant cannot sign the application. Important Note: Signatures must be original in ink, not reproduced by photocopy, fax, or other means, and must be received before any permit is issued.

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382; the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name:	Kim Foley
Signature:	I'm Pley
	Original signature is required.
Date:	11/12/19



### Basis2 Receipt Report by Endorsement Number

NOV-18-19 04:37 PM

Acct. #: PAF	Accoun	t Name:	PERMIT AMENDMENT F	EES (AIR)					
Paid For	Endors. #	Ref #2	Paid In By	PayTyp	Chk #	Card#	Bank Slip	Tran.Date	Receipt Amnt.
OLEFINS 1	WRS0019806	1768	LYO EQUISTAR CHE	WT	WIRE		BS00076778	18-NOV-19	\$3000.00

Report\_ID: Page 1

### Form APD-EXP Expedited Permitting Request

I. Contact Information	
Company or Other Legal Customer Name: Equistar Chemicals, LP	
Customer Reference Number (CN): 600124705	
Regulated Entity Number (RN): 100542281	
Company Official or Technical Contact Name: Teresa Peneguy	
Phone Number: 281-452-8330	
Email: teresa.peneguy@lyb.com	
II. Project Information	
Facility Type: Channelview Facility, OP1 Unit	
Permit Number: 1768	
Project Number: TBD	
III. Economic Justification	
The purpose of the application associated with this request to expedite will benefit the economy of this state or an area of this state.	⊠ YES □ NO
IV. Delinquent Fees and Penalties	
Applications will not be expedited if any delinquent fees and/or penalties are owed to the of the Attorney General on behalf of the TCEQ. For more information regarding Delinquer Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/delin/index.html.	ΓCEQ or the Office nt Fees and
V. Signature	
The signature below confirms that I have knowledge of the facts included in this application facts are true and correct to the best of my knowledge and belief. As the applicant, I commexpectations of the expedited permitting program and application requirements promptly expectation or requirement may cause my application to be removed from the expedited pand possibly voided at the discretion of the TCEQ Executive Director. The signature further awareness that intentionally or knowingly making or causing to be made false material star representations in the application is a criminal offense subject to criminal penalties.	it to fulfilling all . Failure to meet any ermitting program er signifies
Name: Teresa Peneguy	
Signature: Leves Pengy	
Date: 11/8/2019	

**Reset Form** 



### Basis2 Receipt Report by Endorsement Number

NOV-18-19 04:36 PM

Acct. #: APS Account Name: AIR PERMIT EXPEDITED FEE

Paid For Endors. # Ref #2 Paid In By PayTyp Chk # Card# Bank Slip Tran.Date Receipt Amnt. 1768/OLEFINS 1 WRS0019799 WIRE BS00076778 \$20000.00 LYO EQUISTAR CHE WT 18-NOV-19

Report\_ID: Page 1

### APPENDIX B TECHNICAL APPLICATION TABLES

### **Technical Application Tables**

The following table is included in this appendix:

Table 2F – Project Increases

#### TABLE 2F PROJECT EMISSION INCREASE

Pollutant <sup>1</sup> :	Nox	Nox		1768
Baseline Period:	N/A new stream	to		

	Affected or Modi	fied Facilities <sup>2</sup>	Permit No.	Permit No. Actual Emissions <sup>3</sup>	Baseline	Baseline Proposed Project Actual		Difference (B-	7	Project
	FIN	EPN	Permit No.	Actual Emissions	Emissions <sup>4</sup>	Emissions <sup>5</sup>	Emissions	A) <sup>6</sup>	Correction <sup>7</sup>	Increase <sup>8</sup>
1.	38E01	38E01	1768	0	0	19.37	19.37	19.37		19.37
2.										
3.										
4.										
5.										
6.										
7.										
8.										
9.										
	Page Subtotal <sup>9</sup>							19.37		

<sup>&</sup>lt;sup>1</sup> Individual Table 2F=s should be used to summarize the project emission increase for each criteria pollutant

Correct actual emissions for currently applicable rule or permit requirements, and periods of non-compliance. These corrections, as well as any MSS previously

Correction made to emission increase for what portion could have been accommodated during the baseline period. The justification and basis for this estimate must be

<sup>&</sup>lt;sup>2</sup> Emission Point Number as designated in NSR Permit or Emissions Inventory

<sup>&</sup>lt;sup>3</sup> All records and calculations for these values must be available upon request

<sup>&</sup>lt;sup>4</sup> demonstrated under 30 TAC 101, should be explained in the Table 2F supplement

<sup>&</sup>lt;sup>5</sup> If projected actual emission is used it must be noted in the next column and the basis for the projection identified in the Table 2F supplement

<sup>&</sup>lt;sup>6</sup> Proposed Emissions (column B) minus Baseline Emissions (column A)

<sup>&</sup>lt;sup>7</sup> provided in the Table 2F supplement

<sup>&</sup>lt;sup>8</sup> Obtained by subtracting the correction from the difference. Must be a positive number.

<sup>&</sup>lt;sup>9</sup> Sum all values for this page.

### APPENDIX C EMISSION CALCULATIONS

Included in this appendix is the emissions calculations for the additional natural gas to the flare. The fugitive emissions calculations associated with the PBR being incorporated with this permit amendment are also included.

#### Flare Emissions Natural Gas addition

**Emission Factors** 

NOx 0.068 lb/MMBtu TCEQ EI Guidance for Steam-assist flare CO 0.3503 lb/MMBtu TCEQ EI Guidance for Steam-assist flare

SO2 5 gr/100 dscf vendor spec

2.5 gr/100 dscf historically used factor
VOC 5.5 lb/MMscf AP-42 Natural Gas Combustion

1020 Btu/scf

EPN: 38E01

Avg Natural Gas 178,618 scfh Max Natural Gas 240,000 scfh

Max Hourly	Current Auth	Nat Gas Increase	Total
IVIAX HOUTLY	lb/hr	lb/hr	lb/hr
NOx	104.3	16.65	120.95
CO	537.25	85.75	623
SO2	-	3.43	-
VOC	1375.9	1.32	1377.22

Annual	Current Auth	Nat Gas Increase	Total
Aililuai	tpy	tpy	tpy
NOx	16.3	19.37	35.67
CO	81.36	99.79	181.15
SO2	3.8	5.59	9.39
VOC	49.15	4.3	53.45

#### Sample Calculation

Hourly NOx

240,000 scf	1020 Btu	MMBtu	0.068 lb	=	16.65 lb NOx
hr	scf	10^6 Btu	MMBtu		hr

Annual SO2

178,618 scf	MMscf	2.5 gr	lb S	2 lb SO2	8760 hr	ton	=	5.59 ton SO2	
hr	10^6 scf	100 dscf	7000 gr	lb S	vr	2000 lb	=	hr	

#### SO2 existing hourly convert to 5 S grain/ 100 dscf basis

current auth	5 gr
2.5 gr / 100 dscf	100 dscf

Unit	Permit before SP	Factor current	Current lb,	Current tp	Revised lb/hr	Revised tpy
OP1	1768	2.5 gr/100 dscf	10.80	3.80	21.60	3.80
Add Nat Gas		5 gr/100 dscf			3.43	5.59
			10.80	3.80	25.03	9.39

	lb/hr
Current Auth	10.80
Increase	14.23
Proposed Allowable	25.03

#### OP1 Fugitive (EPN F34E00) Emissions Summary

#### **VOC Emissions Summary**

	Total (lbs/hr)	Total (ton/year)
Total Emissions	1.09	4.76
VOC Percentage	100.00%	100.00%
Total VOC Emissions	1.09	4.76

#### **Fugitives Estimated Emissions**

Component Class	Chemical State	SOCMI Factor	Factor	Control Credit	Sum of Count	Emissions Estimate (lb/hr)	Emissions Estimate (tpy)
Connector	Gas / Vapor	SOCMI Average	0.0039	75%	23	0.02	0.10
Connector	Light Liquid	SOCMI Average	0.0005	75%	5	0.00	0.00
Connector	Gas / Vapor	SOCMI Average	0.0039	97%	121	0.01	0.06
Connector	Light Liquid	SOCMI Average	0.0005	97%	68	0.00	0.00
Other Component 1	Gas / Vapor	SOCMI Average	0.0132	75%	41	0.14	0.59
Other Component 1	Light Liquid	SOCMI Average	0.0089	75%	27	0.06	0.26
Valve	Gas / Vapor	SOCMI Average	0.0132	75%	16	0.05	0.23
Valve	Light Liquid	SOCMI Average	0.0089	75%	4	0.01	0.04
Valve	Gas / Vapor	SOCMI Average	0.0132	97%	46	0.02	0.08
Valve	Light Liquid	SOCMI Average	0.0089	97%	28	0.01	0.03
Connector	Gas / Vapor	SOCMI with Ethylene	0.0053	75%	2	0.00	0.01
Connector	Light Liquid	SOCMI with Ethylene	0.0052	75%	2	0.00	0.01
Connector	Gas / Vapor	SOCMI with Ethylene	0.0053	97%	11	0.00	0.01
Connector	Light Liquid	SOCMI with Ethylene	0.0052	97%	12	0.00	0.01
Other Component 1	Gas / Vapor	SOCMI with Ethylene	0.0258	75%	6	0.04	0.17
Other Component 1	Light Liquid	SOCMI with Ethylene	0.0459	75%	12	0.14	0.60
Valve	Gas / Vapor	SOCMI with Ethylene	0.0258	75%	1	0.01	0.03
Valve	Light Liquid	SOCMI with Ethylene	0.0459	75%	2	0.02	0.10
Valve	Gas / Vapor	SOCMI with Ethylene	0.0258	97%	7	0.01	0.02
Valve	Light Liquid	SOCMI with Ethylene	0.0459	97%	14	0.02	0.08
Connector	Gas / Vapor	SOCMI without Ethylene	0.0029	75%	87	0.06	0.28
Connector	Light Liquid	SOCMI without Ethylene	0.0005	75%	368	0.05	0.20
Connector	Gas / Vapor	SOCMI without Ethylene	0.0029	97%	86	0.01	0.03
Connector	Light Liquid	SOCMI without Ethylene	0.0005	97%	162	0.00	0.01
Other Component 1	Gas / Vapor	SOCMI without Ethylene	0.0089	30%	28	0.17	0.76
Other Component 1	Light Liquid	SOCMI without Ethylene	0.0035	30%	60	0.15	0.64
Valve	Gas / Vapor	SOCMI without Ethylene	0.0089	75%	14	0.03	0.14
Valve	Light Liquid	SOCMI without Ethylene	0.0035	75%	25	0.02	0.10
Valve	Gas / Vapor	SOCMI without Ethylene	0.0089	97%	55	0.01	0.06
Valve	Light Liquid	SOCMI without Ethylene	0.0035	97%	173	0.02	0.08
				Total	1506	1.09	4.76

#### Notes:

- Notes.
  1. Emissions Factors come from "Emissions Factors for Equipment Leak Fugitive Components-Addendum to RG-360A, January 2008-Table 3.
  Average Emission Factors-SOCMI". Different SOCMI factors are used based on the concentration of ethylene in the streams.
- 2. Control efficiencies come from 28VHP "TCEQ Control Efficiencies for TCEQ Leak Detection and Repair Programs Revised 07/11 (APDG 6129v2)"

  3. A 97% control efficiency for connectors is used when monitoring at 500 ppm quarterly.

- A 75% control efficiency for connectors is used when monitoring 500 ppm annually.
   A 75% control efficiency for connectors is used when monitoring 500 ppm annually.
   DTM = Difficult to monitor. UTM = Unable to monitor. Control efficiencies assigned are based on monitoring type and frequency of monitoring.
   Other 1 Components (caps, plugs, & other non-traditional components) calculated using factors according to TCEQ El Guidance Appendix A Table A-6.
   Fugitives emissions are an estimate only and should not be considered as a maximum allowable emission rate.

#### Sample Calculations

#### Hourly Emissions Valve GV

Hourly Estimated VOC Emission Rate (lb/hr) = (SOCMI w/o C<sub>2</sub>)\* Component Count \* (1-Control Efficiency [%])

Hourly Controlled VOC Emission Rate for Gas/Vapor Annual =	0.009	55	(1- 0.97)	0.01
	hr			hr

#### Annual Emissions Connector GV

Annual Estimated VOC Emission Rate (tpy) = (SOCMI w/o  $C_2$ )\* Component Count \* (1-Control Efficiency [%]) \* 8760 / 2000

Annual Estimated VOC Emission Rate for Gas/Vapor =	0.009	55	(1- 0.97)	8760	<u>0.06</u>
	hr			2000	yr

**Fugitives Speciated Emissions** 

Chemical	WT%	Emissions (lb/hr)	Emissions (TPY)
1,3-butadiene	1.15%	0.01	0.05
1,3-Methylpentadiene	0.22%	0.00	0.01
1-Methylindene	0.98%	0.01	0.05
1-Methylnaphthalene	0.39%	0.00	0.02
1-N-Decylnaphthalene	1.45%	0.02	0.07
2-Butene	5.06%	0.05	0.24
2-ethyl-m-xylene	0.55%	0.01	0.03
2-methyl-1-butene	0.30%	0.00	0.01
2-methyl-3-butene	0.17%	0.00	0.01
2-Methylnaphthalene	3.33%	0.04	0.16
Benzene	2.66%	0.03	0.13
Butylenes	4.23%	0.05	0.20
cis-1,3-pentadiene	0.09%	0.00	0.00
cyclopentadiene	0.25%	0.00	0.01
cyclopentane	0.13%	0.00	0.01
cyclopentene	0.16%	0.00	0.01
DCPD	0.24%	0.00	0.01
Di-Methylsulfide	0.37%	0.00	0.02
Ethylene	21.19%	0.23	1.01
HEXANE	1.44%	0.02	0.07
HEXENE	0.56%	0.01	0.03
indene	0.59%	0.01	0.03
isobutane	0.30%	0.00	0.01
Isohexanes	0.30%	0.00	0.01
Isopentane	1.08%	0.01	0.05
Isoprene	0.10%	0.00	0.00
Methyl-Cyclo-Pentadienes	0.68%	0.01	0.03
Methyl-Cyclo-Pentene	0.08%	0.00	0.00
m-methyl-styrene	0.44%	0.00	0.02
naphthalene	5.56%	0.06	0.26
n-butane	4.15%	0.05	0.20
n-decane	1.03%	0.01	0.05
N-Heptane	0.60%	0.01	0.03
N-Octane	3.77%	0.04	0.18
Nonane	2.29%	0.02	0.11
n-pentane	4.40%	0.05	0.21
n-propyl benzene	0.80%	0.01	0.04
PENTENE	0.55%	0.01	0.03
Phenanthrene	0.18%	0.00	0.01
Propane	3.69%	0.04	0.18
PROPYLENE	19.72%	0.21	0.94
Styrene	0.57%	0.01	0.03
Toluene	2.67%	0.03	0.13
Xylene	1.52%	0.03	0.13

Components less than 0.01 % are excluded and considered impurities.

Non-VOCs including, but not limited to, methane, ethane, oxygen, or nitrogen may be present.

Representative worst case scenario identified, additional operating condition scenarios can occur.

#### Recycle Heater F-3701 (EPN: 37E03) Fuel Gas Combustion Emissions

Pollutant	Emission Factor1	Emission Factor Units	Emission Factor Basis	Hourly Emissions lbs/hr	Annual Emissions TPY
NOx	0.10	lbs/MMBtu	AP-42	2.45	10.74
CO (comb)	84	lb/MMscf	AP-42	2.06	9.02
CO (fuel)	0.41	vol%		0.07	0.32
CO (idei)	99.0	% DRE		0.07	0.32
Total CO				0.18	0.79
SO2	0.60	lb/MMscf	AP-42	0.19	0.82
PM, PM10, PM2.52	7.60	lb/MMscf	AP-42	0.13	0.55
Total VOC	5.50	lb/MMscf	AP-42	0.00	0.00

(1) Per AP-42 instructions, AP-42 based emissions corrected to fuel gas with 1020 Btu/Scf heat content. footnote c. Therefore PM10 = PM2.5 emissions.

Heater		F3701								
Operating Conditions	Operating Conditions									
Hourly Firing Rate:	MMBtu/Hr	25								
Annual Firing Rate:	MMBtu/Hr	25								
Fuel Net Heating Value:	Btu/scf	1,020								
Potential Annual Run hours:	Hrs/Yr	8,760								
Speciated VOC Emissions - H	lourly									
ethylene	lb/hr	0.05								
propane	lb/hr	0.01								
propylene	lb/hr	0.03								
1-butene	lb/hr	< 0.01								
1,3-BUTADIENE	lb/hr	< 0.01								
benzene	lb/hr	0.01								
cis-2-BUTENE	lb/hr	0.01								
ISOBUTENE	lb/hr	0.01								
ISOBUTANE	lb/hr	< 0.01								
ISOPENTANE	lb/hr	< 0.01								
n-BUTANE	lb/hr	< 0.01								
trans-2-BUTENE	lb/hr	< 0.01								
Speciated VOC Emissions - A	nnual									
ethylene	tpy	0.20								
propane	tpy	0.04								
propylene	tpy	0.13								
1-butene	tpy	0.02								
1,3-BUTADIENE	tpy	< 0.01								
benzene	tpy	0.04								
cis-2-BUTENE	tpy	0.02								
ISOBUTENE	tpy	0.05								
ISOBUTANE	tpy	0.02								
ISOPENTANE	tpy	0.01								
n-BUTANE	tpy	< 0.01								
trans-2-BUTENE	tpy	0.02								

Components less than 0.01 % are excluded and considered impurities.

Non-VOCs including, but not limited to, methane, ethane, oxygen, or nitrogen may be present.

Representative worst case scenario identified, additional operating condition scenarios can occur.

Sample	Emissions	Calculations	

NOx Hourly Emissions = Emission Factor \* Firing Rate

0.10 lbs NOx	25 MMBtu	_	2.45 lbs NOx
MMBtu	hr	_	hr

NOx Annual Emissions = Emission Factor \* Firing Rate \* Hours of Operation \* ton/lb conversion

0.10 lbs NOx	25 MMBtu	hrs	ton	. =	10.74 ton NOx
MMBtu	hr	yr	2000 lbs	_	yr

 $CO\ Hourly\ Emissions\ from\ Combustion = Emission\ Factor \div AP-42\ Heat\ Value\ *\ (Actual\ to\ AP-42\ HV)\ *\ Firing\ Rate$ 

84.00 lbs CO	scf	1020 Btu/scf	25 MMBtu	=	2.06 lbs CO
MMscf	1020 Btu	1020 Btu/scf	hr	=	hr

CO Hourly Emissions from Waste Gas = Concentration \* Volumetric Flow / Molar Volume \* Molecular Weight CO \* (1-DRE)

0.41 vol%	25 MMBtu	106 Btu	scf	lbmol	28.01 lb CO	1 - 0.99	=	9.02 lbs CO
	hr	MMBtu	1020 Btu	385.46 scf	lbmol CO		_	hr

 $CO\ Annual\ Emissions\ from\ Combustion = Emission\ Factor\ \div\ Heat\ Value\ *\ (Actual\ to\ AP-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ ton/lb\ Ap-42\ HV)\ *\ Firing\ Rate\ *\ Hours\ of\ Operation\ *\ Hours\ Operation\ *\$ 

84.00 lbs CO	scf	1020 Btu/scf	25 MMBtu	hrs	ton	_	0.07 ton CO
MMscf	1020 Btu	1020 Btu/scf	hr	yr	2000 lbs	_	yr

CO Annual Emissions from Waste Gas = Concentration \* Volumetric Flow / Molar Volume \* Molecular Weight CO \* (1-DRE)

0.41 vol%	25 MMBtu	106 Btu	scf	lbmol	28.01 lb CO	hrs	ton	1 - 0.99	=	0.32 ton CO
	hr	MMBtu	1020 Btu	385.46 scf	lbmol CO	yr	2000 lbs		_	yr

### **Diesel Engine Emissions Calculations (EPN: OP1EN1)**

#### **Source Information:**

Horsepower (hp)	525
Hours of Operation	4,500

#### **Criteria Pollutant Emissions Calculations:**

Pollutant	Emission Factor (lb/hp-hr)	Emission Factor (gram/kW- hr)	Emissions (lb/hr)	Emissions (TPY)
PM (10/2.5) 1 & 2	0.0000	0.02	0.02	0.04
VOC 1	0.0003	0.19	0.16	0.37
Nitrogen Oxides 1	0.0033	2.00	1.73	3.88
Sulfur Dioxide 3			0.01	0.01
Carbon Monoxide 1	0.0058	3.50	3.02	6.80

#### **Example Calculations:**

VOC Emissions (TPY)= 0.0003 lb/hp-hr \* 525 hp \* 4500 hr \* 1/2000 tons/lb = 0.37 TPY

<sup>1</sup> Emission factor is based on the EPA standard for Tier 4 engines. Units are in g/kW-hr 1 gram/kilowatt-hour = 0.001643986806

<sup>2</sup> PM10 and PM2.5 are asssumed to be equal to PM emission rates which are based on vendor certification for Tier 4 engine.

<sup>3</sup> Emissions for SO2 are based on the use of ultra low sulfur diesel fuel (15 ppmw sulfur content) and are calculated based on a 188 lb/hr

### APPENDIX D PBR AND STANDARD PERMIT APPROVAL LETTER

Included in this appendix is the TCEQ approval letters for the following Permit By Rules (PBR):

- ➤ PBR Authorization No. 159688 for Fugitive Components;
- ➤ PBR Authorization No. 157139 for replacement in kind Engine.

Included in this appendix is the TCEQ approval letter for the following Standard Permit (SP):

> Standard Permit Authorization No. 156142 for Heater F3701.

Jon Niermann, Chairman Emily Lindley, Commissioner Toby Baker, Executive Director



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 29, 2019

Mr. Tom Warnement Environmental Manager - Air Equistar Chemicals, LP PO BOX 777 Channelview, TX 77530

Permit by Rule Registration Number: 157688

Equistar Chemicals, LP

Project Description/Unit: Equistar Chemicals Channelview Complex

City: Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

30 TAC § 106.261 30 TAC § 106.262

Affected Permit(s): 1768

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

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 1768 when it is amended or renewed.

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

This action is taken under authority delegated by the Executive Director of the TCEQ. If you need further information or have questions, please contact the Rule Registrations Section at (512) 239-1250 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Page 2 Permit No. 157688

Sincerely,

Mark Meyer, Manager

Mark T. Meyer

Rule Registrations Section Air Permits Division Texas Commission on Environmental Quality

[Project Number: 304202]

Jon Niermann, Chairman Emily Lindley, Commissioner Toby Baker, Executive Director



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 19, 2019

Mr. Tom Warnement Environmental Manager - Air Equistar Chemicals, LP PO BOX 777 Channelview, TX 77530

Permit by Rule Registration Number: 157139

Equistar Chemicals, LP

Project Description/Unit: Equistar Chemicals Channelview Complex

City: Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705 30 TAC § 106.512 Effective Date: 06/13/2001

Affected Permit(s): 1768,49120

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

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 1768,49120 when it is amended or renewed.

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

This action is taken under authority delegated by the Executive Director of the TCEQ. If you need further information or have questions, please contact the Rule Registrations Section at (512) 239-1250 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Mark Meyer, Manager

Mark T. Meyer

Rule Registrations Section

Air Permits Division

Texas Commission on Environmental Quality

Page 2 Permit No. 157139

[Project Number: 302186]

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Toby Baker, *Executive Director* 



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 6, 2019

MR TOM WARNEMENT AIR ENVIRONMENTAL MANAGER EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Re: Pollution Control Projects Air Quality Standard Permit

(Effective 2/9/2011)

Standard Permit Registration Number: 156142 Standard Permit Expiration Date: May 6, 2029

Equistar Chemicals LP

**Equistar Chemicals Channelview Complex** 

Affected Permit: 1768 Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

#### Dear Mr. Warnement:

This is in response to your Form PI-1S (Air Quality Standard Permit for Pollution Control Projects) regarding the proposed construction to be located at 8280 Sheldon Rd, Channelview, Harris County. We understand that this registration is for emissions associated with replacing the burner in heater EPN 37E03 with three smaller burners.

After evaluation of the information you submitted, the Texas Commission on Environmental Quality (TCEQ) has determined that your proposed emissions are authorized by this standard permit pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602) if constructed and operated as represented in your registration. This standard permit was issued under the Texas Clean Air Act (TCAA) § 382.011, which authorizes the commission to control the quality of the state's air; TCAA § 381.023, which authorizes the commission to issue orders necessary to carry out the policy and purposes of the TCAA; and § 382.05195, which authorizes the commission to issue standard permits. Authorized emissions are listed on the attached table.

You must begin construction or modification of these facilities in accordance with this standard permit no later than 18 months after the date of this letter. After completion of construction or modification, the appropriate TCEQ Regional Office must be notified prior to commencing operation and the facility shall be operated in compliance with all applicable conditions of the claimed standard permit.

You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit be administratively incorporated into the affected facilities' permit(s) at the next amendment or renewal.

You are also reminded that these facilities must be in compliance with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

Mr. Tom Warnement Page 2 May 6, 2019

Re: Standard Permit Registration Number 156142

If you need further information or have any questions, please contact Mr. Jonathan Wilmoth, P.E. at (512) 239-0567 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

Mark Meyer, Manager Rule Registrations Section

Mark T. Meyer

Air Permits Division

Texas Commission on Environmental Quality

cc: Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Number: 299149

### Standard Permit Maximum Emission Rates Table Permit Number 156142

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

<b>Emission Point No.</b>	Source Name	NSR Permit	Pollutant	Authorized PCP Emissions		
Ellission Point No.	inission foint No. Source Name NSR Femili		Pollularit	lbs/hr	tpy	
			NOx	2.45	10.74	
	Recycle Heater F-3701		СО	2.06	9.02	
					SO <sub>2</sub>	0.18
37E03		1768	PM	0.19	0.82	
			PM <sub>10</sub>	0.19	0.82	
			PM <sub>2.5</sub>	0.19	0.82	
			VOC	0.13	0.55	

VOC - volatile organic compounds

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

CO - carbon monoxide

PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub> as represented

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

SO<sub>2</sub> - sulfur dioxide

Date: May 6, 2019

Date: _	_10/01/2019_
Permit #:	1768
Company:	Equistar

I. Additional Questions for	r Specific NSR Minor Permit Actions	

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_


Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

V. Nonattainment Permits	
	V
Complete the offsets section of the Federal Applicability sheet of this workbook.	Yes
Does the application contain a detailed LAER analysis? (attachment or as notes on the BACT sheet of this workbook)	Yes
Does the application contain an analysis of alternative sites, sizes, production processes, and control techniques for the proposed source? The analysis must demonstrate that the benefits of the proposed location and source configuration significantly outweigh the environmental and social costs of that locati+A124on.	Yes

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

### VIII. Federal Regulatory Questions

Indicate if any of the following requirements apply to the proposed facility. Note that some federal regulations apply to minor sources. Enter all applicable Subparts.

### A. Title 40 CFR Part 60

Date: ַ	_10/01/2019_
Permit #:	1768
Company:	_Equistar

IDa NCDC aubpart/a\ arabitta =									
Do NSPS subpart(s) apply to a	Yes								
facility in this application?	1.00								
List applicable subparts you will									
demonstrate compliance with	A, K, Ka, Kb, VV, NNN	A, K, Ka, Kb, VV, NNN							
(e.g. Subpart M)									
B. Title 40 CFR Part 61									
Do NESHAP subpart(s) apply to a	V								
facility in this application?	Yes								
List applicable subparts you will									
demonstrate compliance with									
(e.g. Subpart BB)	A, FF, V								
,									
C. Title 40 CFR Part 63									
Do MACT subpart(s) apply to a									
facility in this application?	Yes								
List applicable subparts you will									
demonstrate compliance with	A E C H VV EEEE DDDDD 3	777							
(e.g. Subpart VVVV)	A, F, G, H, YY, FFFF, DDDDD, 2	.2.2.2							
	IX. Emissions Revie	₽W							
A. Impacts Analysis									
Any change that results in an incre									
impacts demonstration. Informatio									
application and show compliance			ne information						
necessary to make the demonstra	tion are listed on the Impacts shee	et of this workbook.							
Does this project require an impac	ts analysis?		Yes						
B. Disaster Review									
If the proposed facility will handle s									
cause off-property impacts that co									
required as part of the application.		mitting section for assistance at (	(540) 000 4050						
Additional Guidance can be found	at·		(512) 239-1250.						
, taattional Galdanioe can be lound	aı.		(512) 239-1250.						
https://www.tceq.texas.gov/assets		ewSourceReview/disrev-factshee	,						
	/public/permitting/air/Guidance/Ne		`						
https://www.tceq.texas.gov/assets	/public/permitting/air/Guidance/Ne		t.pdf						
https://www.tceq.texas.gov/assets	/public/permitting/air/Guidance/Ne		t.pdf						
https://www.tceq.texas.gov/assets	/public/permitting/air/Guidance/Ne		t.pdf						
https://www.tceq.texas.gov/assets Does this application involve any a	/public/permitting/air/Guidance/Neair contaminants for which a disas	er review is required?	t.pdf No						
https://www.tceq.texas.gov/assets Does this application involve any a  C. Air Pollutant Watch List	/public/permitting/air/Guidance/Neair contaminants for which a disas	er review is required? that are of concern. The TCEQ h	t.pdf No nas designated						
https://www.tceq.texas.gov/assets Does this application involve any a  C. Air Pollutant Watch List Certain areas of the state have co	/public/permitting/air/Guidance/Neair contaminants for which a disase air contaminants are set of the contaminant for which a disase air contaminants for which are contaminants for which a disase air contaminants for which are conta	er review is required? that are of concern. The TCEQ has a watch list area could result in	No  nas designated additional						
https://www.tceq.texas.gov/assets Does this application involve any a  C. Air Pollutant Watch List Certain areas of the state have co these portions of the state as watch	/public/permitting/air/Guidance/Neair contaminants for which a disase in contaminant for which a disase in contaminate for which are as a contaminate for which a disase fo	er review is required? that are of concern. The TCEQ has a watch list area could result in	No  nas designated additional						
Does this application involve any a  C. Air Pollutant Watch List  Certain areas of the state have co these portions of the state as watch restrictions on emissions of the aff	/public/permitting/air/Guidance/Neair contaminants for which a disast contaminants of specific pollutants challenged in pollutant (s) or additional cound at:	er review is required? that are of concern. The TCEQ has a watch list area could result in	No  nas designated additional						
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C. Air Pollutant Watch List Certain areas of the state have co these portions of the state as watch restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol	/public/permitting/air/Guidance/Neair contaminants for which a disase in contaminants for which a disase in centrations of specific pollutants the list areas. Location of a facility if fected air pollutant(s) or additional bound at:	er review is required? that are of concern. The TCEQ has a watch list area could result in	nas designated additional on of the areas						
C. Air Pollutant Watch List Certain areas of the state have cothese portions of the state as watch restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol	/public/permitting/air/Guidance/Neair contaminants for which a disase in contaminants for which a disase in centrations of specific pollutants the list areas. Location of a facility if fected air pollutant(s) or additional bound at:	er review is required? that are of concern. The TCEQ has a watch list area could result in	nas designated additional on of the areas						
C. Air Pollutant Watch List Certain areas of the state have co these portions of the state as watch restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol Is the proposed facility located in a	/public/permitting/air/Guidance/Neair contaminants for which a disase in contaminants for which a disase in contaminants for which a disase in contaminant for which a disase in contaminant of specific pollutants in the contaminant of the contaminant for which is a contaminant for which a disase in contaminant for which is a contaminant for	er review is required? that are of concern. The TCEQ has a watch list area could result in	nas designated additional on of the areas						
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C. Air Pollutant Watch List Certain areas of the state have co these portions of the state as watch restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol Is the proposed facility located in a  D. Mass Emissions Cap and Tra Is this facility located at a site with	/public/permitting/air/Guidance/Neair contaminants for which a disast contaminant of specific pollutants contaminant feeted air pollutant(s) or additional contaminant contami	that are of concern. The TCEQ representation in a watch list area could result in permit requirements. The location	nas designated additional on of the areas						
C. Air Pollutant Watch List Certain areas of the state have co these portions of the state as watcrestrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicolls the proposed facility located in a state of the proposed facility located at a site with Chambers, Fort Bend, Galveston,	/public/permitting/air/Guidance/Neair contaminants for which a disast contaminant of specific pollutants contained are pollutant(s) or additional cound at:  ogy/apwl/apwl.html a watch list area?  de in the Houston/Galveston nonatta Harris, Liberty, Montgomery, and	that are of concern. The TCEQ has a watch list area could result in permit requirements. The location	nas designated additional on of the areas						
C. Air Pollutant Watch List Certain areas of the state have co these portions of the state as watch restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol Is the proposed facility located in a  D. Mass Emissions Cap and Tra Is this facility located at a site with	/public/permitting/air/Guidance/Neair contaminants for which a disast contaminant of specific pollutants contained are pollutant(s) or additional cound at:  ogy/apwl/apwl.html a watch list area?  de in the Houston/Galveston nonatta Harris, Liberty, Montgomery, and	that are of concern. The TCEQ has a watch list area could result in permit requirements. The location	nas designated additional on of the areas						

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

Permit primary industry (must be selected for workbook to function)

Action Requested (only		Facility ID	Emission Point				Proposed Long-		Long-Term	Unit Type (Used for reviewing BACT and	Unit Type Notes (only if "other" unit type in Colum
1 action per FIN)	summary?	Number (FIN)	Number (EPN)	Source Name	Pollutant	Term (lb/hr)	Term (tpy)	(lb/hr)	Difference (tpy)	Monitoring Requirements)	O)
Consolidate	Yes	F34E00	F34E00	OP1 Fugitives	VOC	74.84	323.31	0.0001	0	Fugitives: Piping and Equipment Leak	
Not New/Modified	Yes	F34E00	F34E00	OP1 Fugitives	NH3	0.12	0.53	0	0	Fugitives: Piping and Equipment Leak	
Not New/Modified	Yes	34FGWATER	34FGWATER	OP1 Wastewater Fugitives	voc	1.35	5.89	0	0	Wastewater Facilities	
	Yes	34FGWATER OP1FUGEXP	34FGWATER	OP1 Wastewater Fugitives	Acetone	<0.01	<0.01	0	0	Wastewater Facilities	
	Yes Yes	FUGNH3	EOP1FUGEXP EFUGNH3	OP1 Fugitives OP1 NH3 Fugitives	VOC NH3	0.46 0.27	2.01 1.18	0	0	Fugitives: Piping and Equipment Leak Fugitives: Piping and Equipment Leak	
	Yes	34E08	34E08	Decoke Vent	CO	132	113.75	0	0	Process Vent	
	Yes	34E08	34E08	Decoke Vent	PM	36	6.5	0	0	Process Vent	
	Yes	34E08	34E08	Decoke Vent	VOC	0.11	0.1	0	0	Process Vent	
	Yes	OP1DECOKE2	EOP1DECOKE2	Decoke Vent 2	co	310	59.6	0	0	Process Vent	
	Yes	OP1DECOKE2	EOP1DECOKE2	Decoke Vent 2	VOC	0.08	0.02	0	0	Process Vent	
	Yes	OP1DECOKE2	EOP1DECOKE2	Decoke Vent 2	PM	1.07	0.1	0	0	Process Vent	
	Yes	OP1DECOKE2	EOP1DECOKE2	Decoke Vent 2	PM10	1.07	0.1	0	0	Process Vent	
	Yes	OP1DECOKE2	EOP1DECOKE2	Decoke Vent 2	PM2.5	1.07	0.1	0	0	Process Vent	
Not New/Modified	Yes	34E10	34E10	Reactor Regeneration Vent	со	3.56	1.02	0	0	Process Vent	
Not New/Modified	Yes	34E10	34E10	Reactor Regeneration Vent	SO2	9.51	2.23	0	0	Process Vent	
	Yes	34E10	34E10	Reactor Regeneration Vent	voc	1.38	0.17	0	0	Process Vent	
	Yes	38E11	38E11	OP1 Cooling Tower	VOC	10.58	19.87	0	0	Cooling Tower	
	Yes	38E11	38E11	OP1 Cooling Tower	PM	6.62	29	0	0	Cooling Tower	
	Yes	38E11	38E11	OP1 Cooling Tower	PM10	3.31	14.5	0	0	Cooling Tower	
Not New/Modified	Yes	38E11	38E11	OP1 Cooling Tower	PM2.5	0.01	0.06	0	0	Cooling Tower	
Not New/Modified	Yes	35E03	35E03	Seal Oil Reservoir Vent	voc	0.01	0.01	0	0	Process Vent	
Not New/Modified	Yes	35E04	35E04	Seal Oil Reservoir Vent	voc	0.01	0.01	0	0	Process Vent	
Not New/Modified	Yes	34PVD3420	34PVD3420	Dilution Generator Vent	voc	1.69	0.14	0	0	Process Vent	
Not New/Modified	Yes	34PVD3420	34PVD3420	Dilution Generator Vent	Acetone	0.05	<0.01	0	0	Process Vent	
	Yes	34STMFUG	34STMFUG	Dilution Steam Vent	VOC	0.85	1.86	0	0	Process Vent	
Not New/Modified Not New/Modified	Yes	34STMFUG 38HTF3804A/B	34STMFUG 38HTF3804A/B	Dilution Steam Vent	Acetone	0.02 3.81	0.05 0.01	0	0	Process Vent	
Not New/Modified	Yes Yes	34HTHTRS	34HTHTRS	Superheater Vents Pyrolysis and Steam Production Common Stack Cracking Heaters: F-3401 F-3415; F- 3418; F-3419 Common Stack Steam Super Heaters: F380001 A/B	NOX	494.93	2022.33	0	0	Process Vent Furnace	
Not New/Modified	Yes	34HTHTRS	34HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters: F-3401 - F-3415; F- 3418; F-3419 Common Stack Steam Super Heaters: F380001 A/B	со	395.03	1612.25	0	0	Furnace	
Not New/Modified	Yes	34HTHTRS	34HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters: F-3401 - F-3415; F- 3418; F-3419 Common Stack Steam Super Heaters: F380001 A/B	SO2	33.85	138.17	0	0	Furnace	
Not New/Modified	Yes	34HTHTRS	34HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters: F-3401 - F-3415; F- 3418; F-3419 Common Stack Steam Super Heaters: F380001 A/B	РМ	37.61	153.52	0	0	Furnace	

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_ Company: \_Equistar\_\_

Action Requested (only	Include these emissions in	Facility ID	Emission Point			Pronosad Shor	t-Proposed Long-	Short-Term	Long-Term	Unit Type (Used for reviewing BACT and	Unit Type Notes (only if "other" unit type in Colum
1 action per FIN)	summary?	Number (FIN)	Number (EPN)	Source Name	Pollutant	Term (lb/hr)	Term (tpy)	(lb/hr)		Monitoring Requirements)	O)
Not New/Modified	Yes	34HTHTRS	34HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters: F-3401 - F-3415; F- 3418; F-3419 Common Stack Steam Super Heaters: F380001 A/B	NH3	1.3	5.26	0	0	Furnace	
Not New/Modified	Yes	34HTHTRS	34HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters: F-3401 - F-3415; F- 3418; F-3419 Common Stack Steam Super Heaters: F380001 A/B	voc	24.98	99.18	0	0	Fumace	
Not New/Modified	No	34HTHTRS	34HTHT0102	F-3401 and F-3402	NOx			0	0	Furnace	
	No	34HTHTRS	34HTHT0304 34HTHT0506	F-3403 and F-3404	CO			0	0	Furnace	
	No No	34HTHTRS 34HTHTRS	34HTHT0506	F-3405 and F-3406 F-3407 and F-3408	SO2 PM			0	0	Furnace Furnace	
	No	34HTHTRS	34HTHT0910	F-3409 and F-3410	VOC			0	0	Furnace	
	No	34HTHTRS	34HTHT1112	F-3411 and F-3412	NOx			0	0	Furnace	
Not New/Modified	No	34HTHTRS	34HTHT1314	F-3413 and F-3414	CO			0	0	Furnace	
Not New/Modified	No	34HTHTRS	34HTHT18	Ethane Cracking Heater: F3418	SO2			0	0	Furnace	
Not New/Modified	No	34HTHTRS	34HTHT15	OP-1 Cracker Heater: F-3415	РМ			0	0	Furnace	
Not New/Modified	No	34HTHTRS	34HTHT38AB	Common Stack: Steam Super Heaters: F380001 A/B with Common Stack	voc			0	0	Furnace	
Not New/Modified	Yes	EF3419	EF3419	OP-1 Cracking Heater F-3419	NOx	38.4	25.71	0	0	Furnace	
Not New/Modified	Yes	EF3419	EF3419	OP-1 Cracking Heater F-3419	со	33.88	148.38	0	0	Furnace	
Not New/Modified	Yes	EF3419	EF3419	OP-1 Cracking Heater F-3419	SO2	0.38	1.54	0	0	Furnace	
Not New/Modified	Yes	EF3419	EF3419	OP-1 Cracking Heater F-3419	РМ	4.23	17	0	0	Furnace	
Not New/Modified	Yes	EF3419	EF3419	OP-1 Cracking Heater F-3419	NH3	2.69	11.78	0	0	Furnace	
Not New/Modified	Yes	EF3419	EF3419	OP-1 Cracking Heater F-3419	voc	0.64	2.57	0	0	Furnace	
Not New/Modified	Yes	36E05	36E05	Regeneration Heater F 3601	INOX	2.5	2.63	0	0	Heater	
Not New/Modified	Yes	36E05	36E05	Regeneration Heater F 3601	CO	2.06	1.95	0	0	Heater	
Not New/Modified	Yes	36E05	36E05	Regeneration Heater F 3601	302	0.18	0.19	0	0	Heater	
Not New/Modified	Yes	36E05	36E05	Regeneration Heater F 3601	FIVI	0.19	0.18	0	0	Heater	
Not New/Modified	Yes	36E05	36E05	Regeneration Heater F	VOC	0.13	0.12	0	0	Heater	
Consolidate Consolidate	Yes Yes	37E03 37E03	37E03 37E03	Recycle Heater F-370  Recycle Heater F-370		2.45	10.74 9.02	-5.6 -4.61	-24.53 -20.2	Heater Heater	
Consolidate	Yes	37E03	37E03	Recycle Heater F-370		0.18	0.79	-4.61	-20.2	Heater	
Consolidate	Yes	37E03	37E03	Recycle Heater F-370		0.19	0.82	-0.42	-1.83	Heater	
Consolidate	Yes	37E03	37E03	Recycle Heater F-370	VOC	0.13	0.55	-0.28	-1.23	Heater	
New/Modified	Yes	38FL3801P/F	38E01	OP1 Flare	NOx	120.95	35.67	16.65	19.37	Control: Flare	
New/Modified	Yes				СО	623	181.15	85.75	99.79		
New/Modified	Yes				SO2	25.03	9.39	14.23	5.59		
New/Modified	Yes	2052002	2052002	Chaltan I 2002	VOC	1377.22	53.45	1.32	4.3	December 1/ant	
Not New/Modified Not New/Modified	Yes Yes	38E3602 38E3603	38E3602 38E3603	Shelter J-3602 Shelter J-3603	VOC	0.01	0.02	0	0	Process Vent Process Vent	
	Yes	38E3604	38E3604	Shelter J-3604	VOC	0.08	0.05	0	0	Process Vent	
	Yes	38E3605	38E3605	Shelter J-3605	VOC	0.02	0.03	0	0	Process Vent	
Not New/Modified	Yes	38E3606	38E3606	Shelter J-3606	VOC	0.01	0.01	0	0	Process Vent	
Not New/Modified	Yes	38E3904	38E3904	Shelter J-3904	VOC	1.28	5.62	0	0	Process Vent	
Consolidate	Yes	OP1EN1	OP1EN1	Diesel Engine-Driven Air Compressor	NOx	1.73	3.88	-1.73	-3.88	Engine: Internal Combustion Engine, Spark Ignited	
Consolidate	Yes	OP1EN1	OP1EN1	Diesel Engine-Driven Air Compressor	со	3.02	6.8	-3.02	-6.8	Engine: Internal Combustion Engine, Spark Ignited	1

Date: _	_10/01/2019_	_
Permit #:	1768	_
Company:	_Equistar	_

Action Requested (only	Include these emissions in annual (tpy)	Facility ID	Emission Point			Pronosed Shor	t-Proposed Long	Short-Term	Long-Term	Unit Type (Used for reviewing BACT and	Unit Type Notes (only if "other" unit type in Colum
1 action per FIN)	summary?	Number (FIN)	Number (EPN)	Source Name	Pollutant	Term (lb/hr)	Term (tpy)	(lb/hr)		Monitoring Requirements)	O)
Consolidate	Yes	OP1EN1	OP1EN1	Diesel Engine-Driven Air Compressor	SO2	0.01	0.01	-0.01	-0.01	Engine: Internal Combustion Engine, Spark Ignited	
Consolidate	Yes	OP1EN1	OP1EN1	Diesel Engine-Driven Air Compressor	РМ	0.02	0.04	-0.02	-0.04	Engine: Internal Combustion Engine, Spark Ignited	
Consolidate	Yes	OP1EN1	OP1EN1	Diesel Engine-Driven Air Compressor	voc	0.16	0.37	-0.01	-0.02	Engine: Internal Combustion Engine, Spark Ignited	
Not New/Modified	Yes	39TK3903	39E03	Storage Tank 3903 (Wastewater/Storm Water)	voc	1.93	5	0	0	Wastewater Facilities	
Not New/Modified	Yes	37TK3709	37E09	Antifoulant Storage Tank 3709	voc	0.28	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	38TK3802	38E07	Pyrolysis Gas Oil Tank 38302	voc	7.38	0.88	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	38TK3802	38E07	Pyrolysis Gas Oil Tank 38302	Benzene	0.05	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	38TK38303	38E08	Storage Tank 38303	voc	2.07	0.23	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	38TK38303	38E08	Storage Tank 38303	Benzene	<0.01	<0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	39TK3913	39E13	Pyrolysis Fuel Oil Tank 3913	voc	11.58	8.06	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	39TK3914	39E14	Storage Tank 3914	voc	2.37	1.95	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	39TK3943	39E43	Storage Tank 3943	voc	2.37	3.64	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	No	39TK3901	39E01	Storage Tank 3901	voc	8.38		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	No	39TK3901	39E01	Storage Tank 3901	Benzene	2.56		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	No	39TK3901	39E01	Storage Tank 3901	H2S	0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	No	39TK3902	39E02	Storage Tank 3902	voc	8.38		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	No	39TK3902	39E02	Storage Tank 3902	Benzene	2.56		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	No	39TK3902	39E02	Storage Tank 3902	H2S	0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	Yes	39TK3902	39E01 to 39E02	Storage Tanks (2 total)	voc		24.68	0	0	pole	
Not New/Modified	Yes	39TK3902	39E01 to 39E02	Storage Tanks (2 total)	Benzene		10.62	0	0		
Not New/Modified	Yes	39TK3902	39E01 to 39E02	Storage Tanks (2 total)	H2S		0.02	0	0		
Not New/Modified	No	39TK3904	39E04	Storage Tank 3904	voc	5.45		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3904	39E04	Storage Tank 3904	Benzene	1.45		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3904	39E04	Storage Tank 3904	H2S	0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3905	39E05	Storage Tank 3905	voc	5.45		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3905	39E05	Storage Tank 3905	Benzene	1.45		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3905	39E05	Storage Tank 3905	H2S	0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3906	39E06	Storage Tank 3906	voc	5.81		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3906	39E06	Storage Tank 3906	Benzene	1.54		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3906	39E06	Storage Tank 3906	H2S	0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3907	39E07	Storage Tank 3907	voc	5.81		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3907	39E07	Storage Tank 3907	Benzene	1.54		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	No	39TK3907	39E07	Storage Tank 3907	H2S	0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	Yes	39TK3907	39E04 to 39E07	Storage Tanks (4 total)	VOC	22.52	38.94	22.52	0		
Not New/Modified	Yes	39TK3907	39E04 to 39E07	Storage Tanks (4 total)		5.98	9.61	5.98	0		
Not New/Modified	Yes	39TK3907	39E04 to 39E07	Storage Tanks (4 total)		0.04	0.01	0.04	0		
Not New/Modified	Yes	39TK3911	39E11	Storage Tank 3911	VOC	2.27	6.84	0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	Yes	39TK3911	39E11	Storage Tank 3911	Benzene	1.59	4.8	0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	Yes	39TK3912	39E12	Storage Tank 3912	voc	2.67	7.95	0	0	Storage Tank (4): Floating roof with TVP <11.0	
Not New/Modified	Yes	39TK3912	39E12	Storage Tank 3912	Benzene	1.87	5.56	0	0	Storage Tank (4): Floating roof with TVP <11.0	

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

Action Requested (only 1 action per FIN)	Include these emissions in annual (tpy) summary?		Emission Point Number (EPN)	Source Name		Proposed Short- Term (lb/hr)	Proposed Long- Term (tpy)			Unit Type (Used for reviewing BACT and Monitoring Requirements)	Unit Type Notes (only if "other" unit type in Column O)
Not New/Modified	Yes	36TK361003	OP1SMLT10	Antifoulant Tank 68423	voc	0.32	0.01	0		Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	34TK3455	34E12	Waste Caustic Tank 3455	voc	0.51	1.62	0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	Yes	38TK38008	38E008	Slop Oil Tank 38008	voc	0.35	1.52	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	38TK38009	38E009	Wastewater Tank 38009	voc	1.03	1.76	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	
Not New/Modified	Yes	38EK38010	38E010	Wastewater Tank 38010	voc	1.46	4.85	0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	Yes	38TK38011	38E011	Wastewater Tank 38011	voc	2.8	6.41	0	0	Storage Tank (4): Floating roof with TVP <11.0 psia	
Not New/Modified	Yes	ENMSSROUT	ENMSSROUT	MSS Vessel	VOC	4.37	0.05	0	0	MSS Activities	
Not New/Modified	Yes	OP1ANALY	EOP1ANALY	Analyzers	VOC	0.03	0.13	0	0	Process Vent	
Not New/Modified	Yes	OP1PV38055	OP1PV38055	Analyzer Vent	VOC	0.08	0.35	0	0	Process Vent	
Not New/Modified	Yes	38E3501A	38E3501A	OP-1 Analyzer	VOC	0.01	0.01	0	0	Process Vent	

# Texas Commission on Environmental Quality Form PI-1 General Application Stack Parameters

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

Emission Point Discharge Parameters												
EPN	Included in EMEW?	UTM Coordinates Zone	East (Meters)	North (Meters)	Building Height (ft)	Height Above Ground (ft)	Stack Exit Diameter (ft)	Velocity (FPS)	Temperature (°F)	Fugitives - Length (ft)	Fugitives - Width (ft)	Fugitives - Axis Degrees
F34E00	Yes											
34FGWATER	No	15										
EOP1FUGEXP	No	15	295087	3301989	15					10	75	
EFUGNH3	No	15	294647	3301759	40					100	150	
34E08	No	15	295109	3302110		90	1.5	131	900			
EOP1DECOKE2	No	15	295112	3302085	90		1.5	131	900			
34E10	No	15	295036	3301890		90	1.5	305.1	700			
38E11	No	15	294723	3301993	50							
35E03	No	15	295007	3301926	20							
35E04	No	15	294981	3301926								
34PVD3420	No	15	295000	3301900								
34STMFUG	No	15	295000	3301900						750	900	90
38HTF3804A/B	No	15										
34HTHTRS	No	15										
34HTHT0102	No	15	295095	3302047								
34HTHT0304	No	15	295096	3302069								
34HTHT0506	No	15	295096	3302092								
34HTHT0708	No	15	295096	3302115								
34HTHT0910	No	15	295096	3302138								
34HTHT1112	No	15	295097	3302160								
34HTHT1314	No	15	295094	3302184								
34HTHT18	No	15	295095	3302023								
34HTHT15	No	15	295096	3302202								
34HTHT38AB	No	15	294979	3302014								
EF3419	No	15	295085	3301821	194		8.5	45	340			
36E05	No	15	295110	3302027	104	85	3.5	38.9	1700			
37E03	No	15	295111	3302027		152	6.5	11	350			
38E01	Yes	13	293111	3302020		132	0.5	11	330			
38E3602	No	15	294896	3301900								
38E3603	No	15	294896	3301965	1							
38E3604	No	15	294896	3302035								
38E3605	No	15	294962	3302035								
38E3606	No											
		15	295004	3302038								
38E3904 OP1EN1	No	15			400	7.0	4.5	204.0	005			
	No	15	004005	0001001	400	7.8	4.5	391.6	865			
39E03	No	15	294865	3301861		40	3	0.1	80			
37E09	No	15	294917	3302184		10.5	3	0.1	80			
38E07	No	15	295055	3302019	33	24	3	0.1	130			
38E08	No	15	295065	3302005		30	3	0.1	130			
39E13	No	15	294666	3301872		48	3	0.1	190			
39E14	No	15	294668	3301849		48	3	0.1	75			
39E43	No	15	294668	3301849		48	3	0.1	75			
39E01	No	15	294986	3301861		40	3	0.1	80			
39E02	No	15	294804	3301862		40	3	0.1	80			

# Texas Commission on Environmental Quality Form PI-1 General Application Stack Parameters

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_ Company: \_Equistar\_\_\_

		UTM Coordinates				Height	Stack Exit					Fugitives -
	Included in		East	North	Building	Above	Diameter	Velocity	Temperature	Fugitives -	Fugitives -	Axis
EPN	EMEW?	Zone	(Meters)	(Meters)	Height (ft)	Ground (ft)	(ft)	(FPS)	(°F)	Length (ft)	Width (ft)	Degrees
39E01 to 39E02	No	15										
39E04	No	15	295038	3301854		48	3	0.1	80			
39E05	No	15	295080	3301852		48	3	0.1	80			
39E06	No	15	295750	3301875		48	3	0.1	80			
39E07	No	15	295750	3301837		48	3	0.1	80			
39E04 to 39E07	No	15										
39E11	No	15	294640	3301829		48	3	0.1	70			
39E12	No	15	294565	3301862		48	3	0.1	70			
OP1SMLT10	No	15										
34E12	No	15	295064	3302212	32							
38E009	No	15	294610	3302123	15							
38E010	No	15	294600	3302154	40							
ENMSSROUT	No	15	295087	3301989	15					100	75	
EOP1ANALY	No	15	295087	3301989	10							
OP1PV38055	No	15										
38E3501A	No	15										

Date: ַ	_10/01/2019_
Permit #:	1768
Company:	_Equistar

No

	I. Public Notice Applicability					
A. Application Type						
ls this an application for a new or major modification of a PSD (including GHG), Nonattainment, or HAP permit?						
Is this an application for a minor permit amo	endment?	Yes				
	ons in this application (a new criteria pollutant or a new VOC or PM	163				
species)?	ins in this application (a new criteria politicant of a new VOC of Fivi	No				
Is there a new air contaminant in this applic	eation?	No				
B. Project Increases and Public Notice T	hresholds (for Initial and Amendment Projects)					
standardized emission factors, or reduction emissions increase would be the sum of en amended permit for each air contaminant. The table below will generate emission incr	ges to permitted allowable emission rates when exclusively due to chars in emissions which are not enforceable through the amended permit nissions increases under the amended permit and the emissions decresses based on the values represented on the "Unit Types - Emission of the "Unit Types - Emission Rates" worksheet to indicate if a unit's potals.	Thus, the total ases under the Rates" sheet.				
Notes:  1. Emissions of PM, PM10, and/or PM2.5 may have been previously quantified and authorized as PM, PM10,and/or PM2.5.  These emissions will be speciated based on current guidance and policy to demonstrate compliance with current standards and public notice requirements may change during the permit review.						
All renewals require public notice.						
This row is optional. If you do not think the table below accurately represents public notice applicability increases for your project, provide discussion here (1000 characters).						

Version 4.0 Page 1

vegetable fibers (agricultural facilities)?

Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or

Date: \_10/01/2019\_ Permit #: 1768 Company: \_Equistar

rm (tnv)	In Allowable	PN Threshold	Notice required?
630.58	3.05	5	No
207.16	-1.87	5	No
14.60	0.00	5	No
0.16	0.00	5	No
2100.96	-9.04	5	No
2133.92	72.79	50	Yes
152.32	3.81	10	No
0.00	0.00	0.6	No
18.75	0	5	No
0.07	0	5	No
30.61	0	5	No
0.03	0	5	No
llu	ıtants is above	Itants is above the threshold.	itants is above the threshold.

<sup>\*\*</sup> Notice of a GHG action is determined by action type. Initial and major modification always require notice. Voluntary updates

require a consolidated notice if there is a change to BACT. Project emission increases of CO2e (CO2 equivalent) are not relevant for determining public notice of GHG permit actions.

Yes
No

#### II. Public Notice Information

Complete this section if public notice is required (determined in the above section) or if you are not sure if public notice is required.

#### A. Contact Information

Enter the contact information for the person responsible for publishing. This is a designated representative who is responsible for ensuring public notice is properly published in the appropriate newspaper and signs are posted at the facility site. This person will be contacted directly when the TCEQ is ready to authorize public notice for the application.

-	
Prefix (Mr., Ms., Dr., etc.):	Mrs.
First Name:	Teresa
Last Name:	Peneguy
Title:	Environmental Permitting

Date: ַ	_10/01/2019_
Permit #: _	1768
Company:	_Equistar

Company Name:	LyondellBasell
Mailing Address:	PO Box 777
Address Line 2:	
City:	Channelview
State:	Texas
ZIP Code:	77530
Telephone Number:	281-452-8330
Fax Number:	
Email Address:	teresa.peneguy@lyb.com
Enter the contact information for the <b>Tec</b> notice as a contact for additional information	chnical Contact. This is the designated representative who will be listed in the public ation.
Prefix (Mr., Ms., Dr., etc.):	Mrs.
First Name:	Teresa
Last Name:	Peneguy
Title:	Environmental Permitting
Company Name:	LyondellBasell
Mailing Address:	PO Box 777
Address Line 2:	
City:	Channelview
State:	Texas
ZIP Code:	77530
Telephone Number:	281-452-8330
Fax Number:	
Email Address:	teresa.peneguy@lyb.com

#### B. Public place

Place a copy of the full application (including all of this workbook and all attachments) at a public place in the county where the facilities are or will be located. You must state where in the county the application will be available for public review and comment. The location must be a public place and described in the notice. A public place is a location which is owned and operated by public funds (such as libraries, county courthouses, city halls) and cannot be a commercial enterprise. You are required to pre-arrange this availability with the public place indicated below. The application must remain available from the first day of publication through the designated comment period.

If this is an application for a PSD, nonattainment, or FCAA §112(g) permit, the public place must have internet access available for the public as required in 30 TAC § 39.411(f)(3).

If the application is submitted to the agency with information marked as Confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC 197, P.O. Box 13087, Austin, Texas 78711-3087.

Name of Public Place:	North Channel Branch Library	
Physical Address:	15741 Wallisville Road	
Address Line 2:		
City:	Houston	
ZIP Code:	77049	
County:	Harris	
Has the public place granted authorization to place the application for public viewing and copying?		Yes
Does the public place have Internet access available for the public?		Yes

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

C. Alternate Language Publicatio	<b>).</b> .	Alternate	Language	<b>Publication</b>
----------------------------------	-------------	-----------	----------	--------------------

In some cases, public notice in an alternate language is required. If an elementary or middle school nearest to the facility is in a school district required by the Texas Education Code to have a bilingual program, a bilingual notice will be required. If there is no bilingual program required in the school nearest the facility, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be required. If it is determined that alternate language notice is required, you are responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

District?		Yes	
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?		Yes	
If yes to either question above, list which bilingual program?	anguage(s) are required by the	Spanish	
D. PSD and Nonattainment Permits Onl	-		
If this is an application for emissions of GI "Consolidated Public Notice". Note: Separ			Not applicable
We must notify the applicable county judg is received. This information can be obtain		Nonattainment pe	rmit or modification application
https://www.txdirectory.com			
Provide the information for the County Ju	<u> </u>	s or will be located	1.
The Honorable:	Lina Hidalgo		
Mailing Address:	1001 Preston, Suite 911		
Address Line 2:			
City:	Houston		
State:	Texas		
ZIP Code:	77002		
Provide the information for the <b>Presiding</b>	Officer(s) of the municipality for this fa	cility site. This is f	frequently the Mayor.
First Name:	Adrian		
Last Name:	Garcia		
Title:	County Commissioner		
Mailing Address:	4500 E Sam Houston Pkwy S Ste 215		
Address Line 2:			
City:	Pasadena		
State:	Texas		
ZIP Code:	77505		
Are the proposed facilities located within 100 km or less of an affected state or Class I Area?	No		

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

III. Small Business Classification	
Complete this section to determine small business classification. If a small business requests a permit, agency rul 39.603(f)(1)(A)) allow for alternative public notification requirements if all of the following criteria are met. If these met, public notice does not have to include publication of the prominent (12 square inch) newspaper notice.	
Does the company (including parent companies and subsidiary companies) have fewer than 100 employees or ess than \$6 million in annual gross receipts?	No
Small business classification:	No

# Texas Commission on Environmental Quality Form PI-1 General Application Federal Applicability

Date: _	_10/01/2019_
Permit #:	1768
Company:	Equistar

I. County Classification			
	i. County Class	sincation	
Does the project require retrospective review?	Does the project require retrospective review?		
County (completed for you from your response on the	ne General sheet)	Harris	
This project will be located in an area that is in attain	oment for ozone as of		
Sept. 23, 2019. Select from the drop-down list to the	e right if you would like		
the project to be reviewed under a different classific	ation.	Ozone - Serious	
		ated in a county with a Serious	
			a Serious Ozone nonattainment elow and provide an analysis with
Determination:	the application.		
II.	PSD and GHG PSD App	olicability Summary	
Is netting required for the PSD analysis for this project?			No
	-		
Pollutant	Project Increase	Threshold	PSD Review Required?
CO	99.79	100	No
NO <sub>x</sub>	19.37	40	No
РМ	0	25	No
PM <sub>10</sub>	0	15	No
PM <sub>2.5</sub>	0	10	No
SO <sub>2</sub>	5.59	40	No
Pb			
H₂S			
TRS			
Reduced sulfur compounds (including H <sub>2</sub> S)			
H <sub>2</sub> SO <sub>4</sub>			
Fluoride (excluding HF)			
CO2e			
II.	II. Nonattainment Appli	icability Summary	
Is netting required for the nonattainment analysi	s for this project?		Yes
If yes, the project increases listed below should be a	after netting has been pe	rformed. Attach the netting inform	nation to the application.
Pollutant	Project Increase (after netting)	Threshold	NA Review Required?

# Texas Commission on Environmental Quality Form PI-1 General Application Federal Applicability

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_ Company: \_Equistar\_\_

Ozone (as VOC)	4.3	40	No
Ozone (as NO <sub>x</sub> )	19.37	5	Yes

Offset Retia Offset Quantity Required Where is the offset coming			
Pollutant	Offset Ratio	(tpy)	Where is the offset coming from
Ozone (as NO <sub>x</sub> )	1.20 : 1	23.244	Purchase

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

I. General Information - Non-Renewal			
Is this project for new facilities controlled and operated directly by the federal government? (30 TAC § 116.141(b)(1) and 30 TAC § 116.163(a))		No	
A fee of \$75,000 shall be required if no estimate of capital project cost is included with the permit application. (30 TAC § 116.141(d)) Select "yes" here to use this option. Then skip sections II and III.		No	
Select Application Type  Major Application			

II. Direct Costs - Non-Renewal		
Type of Cost	Amount	
Process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	\$0.00	
Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	\$0.00	
Freight charges.	\$0.00	
Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	\$0.00	
Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	\$0.00	
Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	\$0.00	
Ambient air monitoring network.	\$0.00	
Sub-Total:	\$0.00	

III. Indirect Costs - Non-Renewal			
Type of Cost	Amount		
Final engineering design and supervision, and administrative overhead.	\$0.00		
Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	\$0.00		
Contractor's fee and overhead.	\$0.00		
Sub-Total:	\$0.00		

#### IV. Calculations - Non-Renewal

For GHG permits: A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application. Identify these other fees in the GHG PSD permit application.

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

In signing the "General" sheet with this fee worksheet attached, I certify that the total estimated capital cost of the project as defined in 30 TAC §116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Estimated Capital Cost	Major Application Fee
Less than \$300,000	\$3,000 (minimum fee)
\$300,000 - \$7,500,000	1.0% of capital cost
\$300,000 - \$25,000,000	N/A
Greater than \$7,500,000	\$75,000 (maximum fee)
Greater than \$25,000,000	N/A

Your estimated capital cost:	\$0.00	Minimum fee applies.
Permit Application Fee:		\$3,000.00

VI. Total Fees		
Note: fees can be paid together with one payment or as two separate payments.		
Non-Renewal Fee	\$3,000.00	
Total	\$3,000.00	

VII. Payment Information			
A. Payment One (required)			
Was the fee paid online?		No	
Enter the fee amount:		\$3,000	
Enter the check, money order, ePay Voucher, or other transaction number:	WRS0019806		
Enter the Company name as it appears on the check:	Equistar Chemicals		

# Texas Commission on Environmental Quality Form PI-1 General Application Fees

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

C. Total Paid	\$3,000.00
)	•

VIII. Professional Engineer Seal Requirement	
Is the estimated capital cost of the project above \$2 million?	No
Is the application required to be submitted under the seal of a Texas licensed P.E.?	No
Note: an electronic PE seal is acceptable.	

Version 4.0 Page 3

# Texas Commission on Environmental Quality Form PI-1 General Application Impacts

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

Pollutant	Does this pollutant require PSD review?	How will you demonstrate that this project meets all applicable requirements?	Notes	Additional Notes (optional)
Ozone	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
voc	No	MERA analysis, steps 0-2 only or using screening tables	Attach a detailed description of which MERA step was met for each species in the project. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.	
NH3	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
Acetone	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
со	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
PM	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
PM10	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
PM2.5	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
SO2	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
NOx	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
Benzene	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
H2S	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	

Version 4.0 Page 1

# Texas Commission on Environmental Quality Form PI-1 General Application BACT

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

DI 4.7				(T) ID40T	0 5	A 1 190
Plant Type				Current Tier I BACT	Confirm	Additional Notes
Plant fuel gas facility				Maximum short term H2S emissions: 0.1 gr/dscf or 160 ppmv. Maximum annual H2S		
Action Requested	FINs	Unit Type	Pollutant		Confirm	Additional Notes
Consolidate	F34E00	Fugitives: Piping and Equipment Leak	voc	Specify which is applicable:  1. Uncontrolled VOC emissions < 10 tpy: none  2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M.  3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors.  4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected.  For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	Complying with 28VHP for components with vapor pressure > 0.002 psia and > 10% VOC
			MSS	Same as normal operation BACT requirements.	Yes	No changes to MSS
Consolidate	37E03	Heater	NOx	Burners with the best NOx performance given the burner configuration and gaseous fuel used. Specify the proposed emission rate (performance is an annual average) and provide justification if NOx>0.01 lb/MMBtu.  Cost data must be submitted for SCR if firing rate is > 300 MMBtu/hr and burner is >0.01 lb/MMBtu.  CEMS required for 100 MMBtu/hr or greater.	Yes	Project did not trigger a major modification, thus not a new BACT review since there was no increase in emissions from the heater.
			MSS	Same as normal operation BACT requirements.	Yes	No changes to MSS
New/Modified	38FL3801P/F	Control: Flare	NOx	Provide emission factor used and reference.	Yes	Use TCEQ factor of 0.068 lb/MMBtu for low Btu, steam-assisted flare
			со	Provide emission factor used and reference.	Yes	Use TCEQ factor of 0.3503 lb/MMBtu for high Btu, steam-assisted flare

# Texas Commission on Environmental Quality Form PI-1 General Application BACT

Date: _	_10/01/2019_
Permit #:	1768
Company:	_Equistar

Action Requested	FINs	Unit Type	Pollutant	Current Tier I BACT	Confirm	Additional Notes
			SO2	Provide emission factor used and reference.	Yes	Natural gas has less than 5 grains/100 dscf
			VOC	VOC: Meets 40 CFR 60.18. Destruction Efficiency: 99% for certain compounds up to three carbons, 98% otherwise. No flaring of halogenated compounds is allowed. Flow monitor required. Composition or BTU analyzer may be required.	Yes	Meets 98% control efficiency and 99% for compounds up to 3 carbons
	_					
	_					
	_					
			MSS	Same as normal operation BACT requirements.	Yes	No changes to MSS
Consolidate	OP1EN1	Engine: Internal Combustion Engine,	NOx	1.0 g/bhp-hr for engines less than 500 hp, 0.5 g/bhp-hr for engines greater than or equal to 500 hp, 0.7 g/bhp-hr is acceptable with vendor guarantee. Achieved through good combustion practices. Provide detail about engine size and numeric value.	Yes	Tier 4 engine
		opani iginiou		Rich burn engine: catalytic converter required and no liquid fuel allowed except for a limited number of backup hours. Provide detail of fuel and number of hours requested.		
	_					
	+					
	1					
	-					
	-			Minimize duration and occurrence of MSS activities.		
				Minimize duration and occurrence of MSS activities.		
			MSS	NOx and CO: provide case-by-case analysis.	Yes	No change to MSS
				Pipelines: VOC in compressor, suction line, and discharge line may be vented.		

Version 4.0 Page 2

#### **Texas Commission on Environmental Quality** Form PI-1 General Application Monitoring

#### Monitoring

This sheet provides the minimum acceptable requirements to demonstrate compliance through monitoring for each pollutant proposed to be emitted from each FIN. This sheet also includes measuring techniques for sources of

#### Instructions:

1. The unit types listed under Unit Type (column B) include all new, modified, consolidated, and/or renewed sources as indicated on the "Unit Types - Emission Rates" sheet. Each new, modified, consolidated, and/or renewed ource must address how compliance will be demonstrated.

2. The pollutants listed in Pollutant (column C) include the pollutants indicated on the "Unit Types - Emission Rates" sheet.

#### Monitoring (30 TAC § 116.111(a)(2)(G))

- The minimum acceptable monitoring is automatically populated for each unit type and pollutant.
   Additional monitoring may be required, particularly for Title V sources, and will be included in the NSR and/or Title V permits.
- . Fully expand the Minimum Monitoring Requirements (column D) by increasing the row heights so all text is visible. (Place the cursor on the bottom of the number line to the far left of the screen, click and drag downward until all text is visible.)
- . Review the monitoring and confirm that you will meet all representations listed on the sheet and any additional attachments by entering or selecting "Yes" in Confirm (column E).
- 6. Add additional notes as necessary in Additional Notes for Monitoring (column F), limited to 500 characters or fewer. Examples include the following:
- Proposed monitoring for pollutants or units that list "See additional notes:";
- Details requested in the populated data; Alternative monitoring you are proposing; and
- Any additional information relevant to the minimization of emissions.
- . Cap EPNs do not need monitoring (leave those rows blank).

#### Measurement of Emissions (30 TAC § 116.111(a)(2)(B))

Note: this section will be greyed out if this project does not require PSD or nonattainment review, as represented on the General sheet.

- For each pollutant with a project increase greater than the PSD significant emission rate, select the proposed measurement technique using the dropdown (column G).
   For each pollutant with a project increase less than the PSD significant emission rate; leave blank.
   If selecting 'other', provide cetals in Additional Notes for Measuring (column) and the properties of th

- 10. You may also use the Additional Notes for Measuring (column H) to provide more details on a selection.

important Note: The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours. All required records must be maintained in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application. Th site must make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner. The applicant must comply with a validational recordkeeping requirements specified in special conditions in the permit. All records must be retained in the file for at least two years following the date that the information or data is obtained. Some permits are required to maintain records for five years. [30 TAC § 116.115(b)(2)(E)]

F34E00  Fugitives: Piping and Equipment Leak  VOC  Follow LDAR monitoring program 28VHP	
STE03   Heater   NOx   Nox	

Version 4.0 Page 1

#### Texas Commission on Environmental Quality Form PI-1 General Application Monitoring

38FL3801P/F	Control: Flare	NOx	Pilot flame presence monitored continuously. Waste gas flow and composition monitored continuously (neasured at the instrument's capability or every 15 minutes, which ever is less), with hourly averages recorded. A Btu analyzer may be substituted for the composition analyzer where the composition is understood.	Yes		
		со	Pilot flame presence monitored continuously. Waste gas flow and	Yes		
		SO2	Pilot flame presence monitored continuously. Waste gas flow and	Voc		
		VOC	Pilot flame presence monitored continuously. Waste gas flow and	Vac		
		100	I liot harrie presence monitored continuously. Waste gas llow and	163		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOX	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOX	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOx	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOX	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		
OP1EN1	Engine: Internal Combustion Engine, Spark Ignited	NOX	Monitor and record startups, shutdowns, maintenance and hours of operation.	Yes		

Version 4.0 Page 2

# Texas Commission on Environmental Quality Form PI-1 General Application Materials

Date: \_10/01/2019\_ Permit #: \_\_\_1768\_\_\_ Company: \_Equistar\_\_\_

Item	How submitted	Date submitted
A. Administrative Information	<u> </u>	•
Form PI-1 General Application	Email	11/19/2019
Hard copy of the General sheet with original (ink) signature	Mail	11/19/2019
Professional Engineer Seal	Not applicable	
B. General Information	i	
Copy of current permit (both Special Conditions and MAERT)		
Core Data Form		
Area map	Mail	11/19/2019
Plot plan	Mail	11/19/2019
Process description	Mail	11/19/2019
Process flow diagram	<u>Mail</u>	11/19/2019
List of MSS activities		
State regulatory requirements discussion	<u>Mail</u>	11/19/2019
C. Federal Applicability		
Summary and project emission increase determination - Tables 1F and 2F	Mail	11/19/2019
Netting analysis (if required) - Tables 3F and 4F as needed	Not applicable	
D. Technical Information		
BACT discussion, if additional details are attached	Email	11/19/2019
Monitoring information, if additional details are attached	Email	11/19/2019
Material Balance (if applicable)	Not applicable	
Calculations		
E. Impacts Analysis		
Qualitative impacts analysis		
MERA analysis	Email	11/19/2019
Electronic Modeling Evaluation Workbook: SCREEN3	Email	11/19/2019
Electronic Modeling Evaluation Workbook: NonSCREEN3	Not applicable	
PSD modeling protocol		
F. Additional Attachments		
Emissions Calculations	Email	11/19/2019
Expedited Permit Fee	Mail	11/19/2019

Version 4.0 Page 1

## Electronic Modeling Evaluation Workbook for SCREEN3 General Information

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

EMEW Version No.: Version 2.2

#### **Purpose Statement:**

This workbook is completed by the applicant and submitted to the Texas Commission on Environmental Quality (TCEQ), specifically, the Air Dispersion Modeling Team (ADMT) for review. This workbook is a tool available for all projects using SCREEN3 for an impacts review and its use is required starting June 1, 2019. Provide the workbook with the permit application submittal for any Minor New Source Review project requiring a modeling impacts demonstration.

This workbook follows the guidance outlined in the Air Quality Modeling Guidelines (APDG 6232, September 2018) which can be found here:

https://www.tceq.texas.gov/assets/public/permitting/air/Modeling/guidance/airquality-mod-guidelines6232.pdf

#### Workbook Instructions:

- 1. Save a copy of the workbook to your computer or desktop prior to entering data.
- 2. Complete all required sections leaving no blanks. You may use the "tab" button or the arrow keys to move to the next available cell. Use "enter" to move down a line. Note: drop-downs are case-sensitive.
- 3. Fill in the workbook in order, do not skip around as this will cause errors. Use caution if changing a previously entered entry.
- 4. Not applicable sections of this workbook will be hidden as data is entered. For example, answering "No" to "Is downwash applicable? " will hide these sections of the workbook required only for downwash entry.
- 5. Email the workbook electronic file (EMEW) and any attachments to the Air Permits Initial Review Team. The subject line should read "Company Name Permit Number (if known) NSR Permit Application". Email address:

#### apirt@tceq.texas.gov

- 6. If printing the EMEW, follow the directions below to create a workbook header.
- 7. Printing the EMEW is not required for submitting to the Air Permits Division (APD); however, you may need to print it for sending to the regional offices, local programs, and for public access if notice is required. To print the workbook, follow the instructions below. Please be aware, several sheets contain large amounts of data and caution should be taken if printing, such as the Speciated Emissions sheet.
- 8. Updates may be necessary throughout the review process. Updated workbooks must be submitted in electronic format to APD. For submittal to regional offices, local programs, or public places you only have to print sheets that had updates. Be sure to change the headers accordingly.

**Note:** Since this will be part of the permit application, follow the instructions in the Form PI-1 General Application where to send copies of your EMEW and permit application. The NSR Application Workbook can be found

https://www.tceq.texas.gov/permitting/air/guidance/newsourcereview/nsrapp-tools.html

#### **Create Headers Before Printing:**

- 1. Right-click one of the workbook's sheet tabs and "Select All Sheets."
- 2. Enter the "Page Layout View" by using the navigation ribbon's View > Workbook Views > Page Layout, or by clicking the page layout icon in the lower-right corner of Excel.
- 3. Add the date, company name, and permit number (if known) to the upper-right header. Note that this may take up to a minute to update your spreadsheet. Select any tab to continue working on the spreadsheet.

#### Printing Tips:

While APD does not need a hard copy of the full workbook, you may need to print it for sending to the regional offices, local programs, and for public access if notice is required.

- 1. The default printing setup for each sheet in the workbook is set for the TCEQ preferred format. The print areas are set up to not include the instructions on each sheet.
- 2. You have access to change all printing settings to fit your needs and printed font size. Some common options include:
  - -Change what area you are printing (whole active sheet or a selection);
  - -Change the orientation (portrait or landscape);
  - -Change the margin size; and
  - -Change the scaling (all columns on one sheet, full size, your own custom selection, etc.).

## Electronic Modeling Evaluation Workbook for SCREEN3 General Information

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

	Acknowledgement:	Select from the drop down:
Evaluation Workbook and any requested data, I have not char	tting an authorized TCEQ Electronic Modeling necessary attachments. Except for inputting the nged the TCEQ Electronic Modeling Evaluation g but not limited to changing formulas, formatting,	Choose an item
	Administrative Information:	
Data Type:	Facility Information:	
Project Number (6 Digits):		
Permit Number:	1768	
Regulated Entity ID (9 Digits):	100542281	
Facility Name:	Equistar Channelview	
Facility Address:	8280 Sheldon Road	
Facility County (select one):	Harris	
Company Name:	Equistar Chemicals, LP	
Company Contact Name:	Teresa Peneguy	
Company Contact Number:	281-452-8330	
Company Contact Email:	teresa.peneguy@lyb.com	
Modeling Contact Name:	Teresa Peneguy	
Modeling Company Name, as applicable:	LyondellBasell	
Modeling Contact Number:	281-452-8330	
Modeling Contact Email:	teresa.peneguy@lyb.com	
New/Existing Site (select one):	Existing Site	
Modeling Date (MM/DD/YYYY):	9/25/2019	
UTM Zone (select one):	15	

Sheet Instructions: Indicate in the Table of Contents which sections are applicable and included for this modeling demonstration. Select "X" from the drop down if the item below is included in the workbook. Note: This workbook is only for SCREEN3 analyses. Please use the separate Electronic Modeling Evaluation Workbook (EMEW) for the following air dispersion models: AERSCREEN, ISC/ISCPrime, and/or AERMOD.

Table of Contents						
Section:	Sheet Title (Click to jump to specific sheet):	Select an X from the dropdown menu if included:				
1	General					
2	Model Options	X				
3	Building Downwash					
4	Flare Source Parameters	X				
5	Point Source Parameters					
6	Area Source Parameters	X				
7	Volume Source Calculations					
8	Volume Source Parameters					
9	Point and Flare Source Emissions	X				
10	Area Source Emissions	X				
11	Volume Source Emissions					
12	Speciated Emissions	X				
13	Intermittent Sources					
14	Modeling Scenarios	Х				
15	Monitor Calculations					
16	Background Justification					
17	Secondary PM2.5 Analysis (MERPs calculations)					
18	NAAQS/State Property Line (SPL) Modeling Results	X				
19	Unit Impact Multipliers	X				
20	Health Effects Modeling Results	X				
21	Modeling File Names	X				

Electronic Modeling Evaluation Workbook for SCREEN3

General Information

22 <u>Speciated Chemicals</u> X
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# Electronic Modeling Evaluation Workbook for SCREEN3 General Information

Included Attachments Instructions: The following are attachments that must be included with any modeling analysis. If providing the plot plan and area map with the permit application, ensure there is also a copy with the EMEW. The copy can be electronic.	Select an X from the dropdown menu if included:
Plot Plan:	
Instructions: Mark all that apply in the attached plot plan. For larger properties or dense soumultiple zoomed in plot plans that are legible.	urce areas, provide
Property/Fence Lines all visible and marked.	X
North arrow included.	X
Clearly marked scale.	X
All sources and buildings are clearly labeled.	X
Area Map:	
Instructions: Mark all that apply in the attached area map.	
Annotate schools within 3,000ft of source's nearest property line.	X
All property lines are included.	X
Non-industrial receptors are identified.	X
Additional Attachments (as applicable):  Note: These are just a few examples of attachments that may need to be included. There may be others depending on the scope of the modeling analysis.	Select an X from the dropdown menu if included:
Single Property Line Designation	
Include Agreement, Order, and map defining each petitioner.	X
Post Processing using Unit Impact Multipliers (UIMs)	
Include documentation on any calculations used with the UIMs (i.e., Step 3 of the MERA).	
Modeling Techniques	
Provide documentation on modeling techniques indicated in the workbook.	
Other Attachments Provide a list in the box below of additional attachments being provided that are not listed a	
	Choose an item

Electronic Modeling Evaluation Workbook for SCREEN3

Model Options

	Date:	_9/2	26/201
	Permi	176	
Company N	Name:	E	quista

<ol> <li>Project Information</li> </ol>	1
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**A.** Project Overview: In the box below, give a brief Project Overview. To type or insert text in box, double click in the box below. *Please limit your response to 2000 characters.* 

Natural gas is being added to flare to meet furture regulatory flame zone heat value requirements for flares.

#### II. Air Dispersion Modeling Preliminary Information

**Instructions:** Fill in the information below based on your modeling setup. The selections chosen in this sheet will carry throughout the sheet and workbook. Based on selections below, only portions of the sheet and workbook will be available. Therefore, it is vital the sheet and workbook are filled out in order, do NOT skip around.

For larger text boxes, double click to type or insert text.

Δ	Ruilding	Downwash

No	Is downwash applicable? (Select "Yes" or "No")							
B. Type of Analyses: (Select "X" in all that apply)								
X Minor NSR NAAQS X State Property Line								
X	Health Effects							

# Electronic Modeling Evaluation Workbook for SCREEN3 Model Options

C. Constituents Evaluating: (Select "X" in all that apply)								
NAAQS: List all pollutants that require an modeling review. (Select "X" in all that apply)								
X	SO <sub>2</sub>		PM <sub>10</sub>					
Х	со		PM <sub>2.5</sub>					
	Pb	X	NO <sub>2</sub>					
Both			Identify which averaging periods are being evaluated for NO <sub>2</sub> .					
Tier 2: 0.9			Identify the 1-hr NO <sub>2</sub> tier used for SCREEN3.					
Tier 2: 0.9			Identify the annual NO <sub>2</sub> tier used for SCREEN3.					
State Properthat apply)	erty Line: List all pollutants	that require	an modeling review. (Select "X" in all					
	H <sub>2</sub> S	Χ	SO <sub>2</sub>					
	H <sub>2</sub> SO <sub>4</sub>		ı					
Health Effe numbers, a		missions she	eet with all applicable pollutants, CAS					
	on Options: Select "X" in th sure to explain the reasonii		ect an option. Note: if selecting both the box below.					
X	Urban							
	Rural							
Provide justification on the dispersion option selected above in the following box:								
i. To that just								

## Texas Commission on Environmental Quality Electronic Modeling Evaluation Workbook for SCREEN3 **Model Options**

Date:	_9/26/2019
Perm	it #:1768
Company Name:	Equistar

E. Meteorological Data:	
Select Meteorological Dataset Modeled:	Full Meteorological Data
5. December Oil	
F. Receptor Grid:  Describe the receptor grid being modeled in the foll	owing toxt box:
10 m - 25000 m array; at ground level	Owing text box.
G. Terrain:	
Select the terrain option being modeled:	Flat
For justification on terrain selection, fill in the box be	elow:
Land is costal and flat	
H. Modeling Techniques: Briefly describe any mod analyses. Provide additional attachments, if needed	•
Modeled emissions equivalent to 1 lb/hr increase; e not be impacted by downwash structures; fugitives factor per TCEQ memo	

Electronic Modeling Evaluation Workbook for SCREEN3
Flare Source Parameters

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

#### Facility:

		Modeling	Easting:	Northing:	Height	Heat Release	
EPN	Model ID	Scenario	X [m]	Y [m]	[m]	(cal/s)	Description
38E01	38E01 Avg	Routine	295310.00	3301607.00	167.64	5351799.73	OP1 Flare

Electronic Modeling Evaluation Workbook for SCREEN3

Area Source Parameters

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

#### Facility:

					Modeled	Longer Side				
		Modeling	Easting:	Northing:	Release Height	Length X	Shorter Side			
EPN	Model ID	Scenario	X [m]	Y [m]	[m]	[m]	Length Y [m]	Area Source Size Justification	Area Source Release Height Justification	Source Description
F34E00	F34E00	Routine	295000.00	3301900.00	1.00	243.00	206.00	Area of process unit	source at ground level	fugitive emission sources

Electronic Modeling Evaluation Workbook for SCREEN3

Point + Flare Emissions

Facility:													
												Downwash	Distance to
		Modeling					Intermittent	Modeled Emission		Scalars or		Structure	Ambient Air
EPN	Model ID	Scenario	Pollutant	Averaging Time	Standard Type	Review Context	Source?	Rate [lb/hr]	Basis of Emission Rate	Factors Used?	Scalar/Factor in Use	Considered	(m)
38F01	38E01 Ava	Routine	Generic	1-hr			No	1.00	Generic Modeling at 1 lb/br	No			497.00

# Electronic Modeling Evaluation Workbook for SCREEN3 Area Source Emissions

а	С	il	it	у	:

EPN	Model ID	Modeling Scenario	Pollutant	Averaging time	Standard Type	Review Context	Intermittent Source?	Modeled Emission Rate [lb/hr]	Basis of Emission Rate	Scalars or Factors Used?	Scalar/Factor in Use	Distance to Ambient Air (m)
F34E00	F34E00	Routine	Generic	1-hr			No	1.00	maximum	Yes	0.60	420.00
												+
												+
												+
												+
												+
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												+
												+

# Electronic Modeling Evaluation Workbook for SCREEN3 Speciated Emissions

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

eciated Emissions by	Model ID			
			Short-Term ESL	Long-Term ESL
CAS#	Chemical Species	Other Species	(µg/m³)	(µg/m³)
106-99-0	1,3-butadiene		510	9.9
504-60-9	1,3-pentadiene		2000	200
29036-25-7	1-methyl-1H-indene		470	47
90-12-0	1-methylnaphthalene		200	20
N/A	Other (Please specify):	alkyl naphthalene	200	20
107-01-7	2-butene		10000	480
2870-04-4	2-ethyl-1,3-dimethylbenzene		2560	256
563-46-2	2-methyl-1-butene		290	480
563-45-1	3-methyl-1-butene		290	2200
91-57-6	2-methylnaphthalene		200	20
71-43-2	benzene		170	4.5
115-11-7	isobutene		180000	32000
1574-41-0	cis-piperylene		2000	200
542-92-7	cyclopentadiene		2000	200
287-92-3	cyclopentane		17000	1700
142-29-0	cyclopentene		3700	370
77-73-6	dicyclopentadiene		60	27
75-18-3	dimethyl sulfide		7.6	25
74-85-1	ethylene		1400	34
110-54-3	n-hexane		5600	200
592-41-6	1-hexene		1700 240	170 24
95-13-6	indene		23000	7100
75-28-5	isobutane		5600	200
107-83-5 78-78-4	2-methylpentane		59000	7100
78-79-5	isopentane		130	120
26519-91-5	isoprene		1000	100
693-89-0	1-methylcyclopentadiene		3700	370
093-09-0	1-methylcyclopentene		3/00	370

m-methylstyrene

100-80-1

250

48

Electronic Modeling Evaluation Workbook for SCREEN3
Speciated Emissions

91-20-3	nanhthalana	440	50
106-97-8	naphthalene	66000	7100
124-18-5	n-butane	1700	330
	n-decane		
142-82-5	n-heptane	10000	2700
111-65-9	n-octane	5600	540
111-84-2	n-nonane	4800	450
109-66-0	n-pentane	59000	7100
103-65-1	n-propylbenzene	2500	250
109-67-1	1-pentene	290	480
85-01-8	phenanthrene	8	0.8
74-98-6	propane	Simple Asphyxiant	Simple Asphyxiant
115-07-1	propylene	Simple Asphyxiant	Simple Asphyxiant
100-42-5	styrene	110	140
108-88-3	toluene	4500	1200
1330-20-7	xylene	2200	180

Date: \_9/26/2019 Permit #: \_\_1768 **Electronic Modeling Evaluation Workbook for SCREEN3** Company Name: \_\_Equistar **Combined Emissions** 

EPN	Model ID	Modeling scenario	Pollutant	Modeled Averaging time	Standard Type	Review Context	Intermittent	Source Type	Modeled Emission Rate [lb/hr]	Downwash Structure Considered
38E01	38E01 Avg	Routine	Generic	1-hr	NAAQS	SIL Analysis	No	Flare	1.00	
F34E00	F34E00	Routine	Generic	1-hr	Health Effects	Project-Wide	No	Area	1.00	

Electronic Modeling Evaluation Workbook for SCREEN3

Modeling Scenarios

Modeling Scenario	Scenario Description:
Routine	Average heat release

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Permit #: \_\_1768 Company Name: \_\_Equistar

Date: \_9/26/2019

Table 1. Project-Related Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	3.47000	14.3
H <sub>2</sub> SO <sub>4</sub>	1-hr		1
H <sub>2</sub> SO <sub>4</sub>	24-hr		0.3
H <sub>2</sub> S	1-hr		2.16 (If property is residential, recreational, business, or commercial)
H₂S	1-hr		3.24 (If property is not residential, recreational, business, or commercial)

Table 2. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m³)	Standard (µg/m³)		
SO <sub>2</sub>	1-hr		715		
H <sub>2</sub> SO <sub>4</sub>	1-hr		50		
H <sub>2</sub> SO <sub>4</sub>	24-hr		15		
H <sub>2</sub> S	1-hr		108 (If property is residential, recreational, business, or commercial)		
H₂S	1-hr		162 (If property is not residential, recreational, business, or commercial)		

Date: \_9/26/2019

Permit #: \_\_1768

Company Name: \_\_Equistar

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Table 3. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	3.47000	7.8*
SO <sub>2</sub>	3-hr	3.12000	25
SO <sub>2</sub>	24-hr	1.39000	5
SO <sub>2</sub>	Annual	0.28000	1
PM <sub>10</sub>	24-hr		5
NO <sub>2</sub>	1-hr	3.65000	7.5**
NO <sub>2</sub>	Annual	0.29000	1
CO	1-hr	20.89000	2000
CO 8-hr		1.67000	500

Additional information for the De Minimis values listed above can be found at: www.tceq.texas.gov/assets/public/permitting/air/memos/appwso2.pdf

<sup>\*\*</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

# Electronic Modeling Evaluation Workbook for SCREEN3 NAAQS-SPL Modeling Results

Permit #: \_\_1768 Company Name: \_\_Equistar

Date: \_9/26/2019

Table 4. PM<sub>2.5</sub> Modeling Results for Minor NSR De Minimis

Pollutant	Pollutant Averaging Time		Secondary PM <sub>2.5</sub> Contribution (μg/m³)	Total Conc. = Secondary $PM_{2.5}$ + GLCmax $(\mu g/m^3)$	De Minimis (μg/m³)				
PM <sub>2.5</sub>	24-hr		0	0.00000	1.2*				
PM <sub>2.5</sub>	PM <sub>2.5</sub> Annual 0		0	0.00000	0.2*				
Additional information for the De Minimis values listed above can be found at:									
* www.tceq.texas.gov/	* www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html								

Table 5. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Pollutant Averaging Time GLCmax (μg/m³)		Background (μg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)	
SO <sub>2</sub>	1-hr		0	0	196	
SO <sub>2</sub>	3-hr		0	0	1300	
SO <sub>2</sub>	24-hr		0	0	365	
SO <sub>2</sub>	Annual		0	0	80	
PM <sub>10</sub>	24-hr		0	0	150	
Pb	3-mo		0	0	0.15	
NO <sub>2</sub>	1-hr		0	0	188	
NO <sub>2</sub>	Annual		0	0	100	
CO	1-hr		0	0	40000	
CO	8-hr		0	0	10000	

## Electronic Modeling Evaluation Workbook for SCREEN3 NAAQS-SPL Modeling Results

Table 6. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m³)	Secondary PM <sub>2.5</sub> Contribution (µg/m³)	Background (μg/m³)	Total Conc. = [Background + Secondary + GLCmax] (µg/m³)	Standard (µg/m³)
PM <sub>2.5</sub>	24-hr		0	0	0	35
PM <sub>2.5</sub>	Annual		0	0	0	12

Electronic Modeling Evaluation Workbook for SCREEN3
Unit Impact Multipliers

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

#### Facility:

EPN	Model ID	Modeling Scenario	1-hr GLCmax (μg/m³ per lb/hr)	3-hr GLCmax (µg/m <sup>3</sup> per lb/hr)	8-hr GLCmax (µg/m³ per lb/hr)	24-hr GLCmax (µg/m³ per lb/hr)	Annual GLCmax (µg/m³ per lb/hr)
38E01	38E01 Avg	Routine	2.44E-01	0.21924	0.17052	0.09744	0.019488
F34E00	F34E00	Routine	2.49E+01	22.41	17.43	9.96	1.992

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

Facility:	Effect Possilts	MERA Guidance	۸۰	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Modeled Health	Ellect Results	WERA Guidance	):	отер 3	Step 4: Production		Step 4: MSS		SIEP 5: MSS UNIY	отер о	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax	Site Wide GLCni [µg/m³]
1.3-butadiene	106-99-0	1-hr	510	0.31	9 [1-9 ]	(F-9···· )			11-5 1		(1-9 )	(F5···· )
1,3-pentadiene	504-60-9	1-hr	2000	0.06			1					
1-methyl-1H-indene	29036-25-7	1-hr	470	0.00			1					
1-methylnaphthalene	90-12-0	1-hr	200	0.27			<del> </del>					
alkyl naphthalene	N/A	1-hr	200	0.39			+					
2-butene	107-01-7	1-hr	10000	1.37			<del> </del>					
	2870-04-4	1-hr	2560	0.15			<del> </del>					
2-ethyl-1,3-dimethylbenzene 2-methyl-1-butene	563-46-2	1-hr	290	0.15			<b>+</b>					
3-methyl-1-butene	563-45-1	1-hr	290	0.05								
	91-57-6		290	0.05								
2-methylnaphthalene	71-43-2	1-hr 1-hr	170	0.90			1					
benzene	115-11-7						1					
isobutene		1-hr	180000	1.15								
cis-piperylene	1574-41-0 542-92-7	1-hr	2000 2000	0.02			-					
cyclopentadiene		1-hr		0.07								
cyclopentane	287-92-3 142-29-0	1-hr	17000 3700	0.04								
cyclopentene	77-73-6	1-hr		0.04								
dicyclopentadiene		1-hr	60	0.06								
dimethyl sulfide	75-18-3	1-hr	7.6	0.10								
ethylene	74-85-1	1-hr	1400	5.73								
n-hexane	110-54-3	1-hr	5600	0.39								
1-hexene	592-41-6	1-hr	1700	0.15								
indene	95-13-6	1-hr	240	0.16								
isobutane	75-28-5	1-hr	23000	0.08								
2-methylpentane	107-83-5	1-hr	5600	0.08								
isopentane	78-78-4	1-hr	59000	0.29								
isoprene	78-79-5	1-hr	130	0.03								
1-methylcyclopentadiene	26519-91-5	1-hr	1000	0.19								
1-methylcyclopentene	693-89-0	1-hr	3700	0.02								
m-methylstyrene	100-80-1	1-hr	250	0.12								
naphthalene	91-20-3	1-hr	440	1.51								
n-butane	106-97-8	1-hr	66000	1.12								
n-decane	124-18-5	1-hr	1700	0.28								
n-heptane	142-82-5	1-hr	10000	0.16								
n-octane	111-65-9	1-hr	5600	1.02								
n-nonane	111-84-2	1-hr	4800	0.62								
n-pentane	109-66-0	1-hr	59000	1.19								
n-propylbenzene	103-65-1	1-hr	2500	0.22								
1-pentene	109-67-1	1-hr	290	0.15								
phenanthrene	85-01-8	1-hr	8	0.05								
propane	74-98-6	1-hr	Simple Asphyxiant	1.32								
propylene	115-07-1	1-hr	Simple Asphyxiant	5.34								
styrene	100-42-5	1-hr	110	0.15								
toluene	108-88-3	1-hr	4500	0.72								
xylene	1330-20-7	1-hr	2200	0.41								
1.3-butadiene	106-99-0	Annual	9.9	0.02								
1,3-pentadiene	504-60-9	Annual	200	0.00								
1-methyl-1H-indene	29036-25-7	Annual	47	0.02								
1-methylnaphthalene	90-12-0	Annual	20	0.02								
Other (Please specify):	30-12-0	Annual	20	0.01			1					
outer (i tease specify).		Alliuai		0.03		1				l .		

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health I	Effect Results	(MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
				10% ESL Step 3 Modeled GLCmax	25 % ESL Step 4 Production GLCmax since most recent site wide	10% ESL Step 4 Production Project Only GLCmax	50% ESL Step 4 MSS GLCmax since most recent site	25% ESL Step 4 MSS Project Only	Full ESL Step 5 GLCmax		Site Wide Cl Cmay	Site Wide GLCni
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	[µg/m³]	modeling [µg/m³]	[µg/m³]	wide modeling [µg/m³]	GLCmax [µg/m³]	[µg/m <sup>3</sup> ]	Was Step 6 relied on to fall out of the MERA?	[µg/m³]	[µg/m³]
2-butene	107-01-7	Annual	480	0.11								
2-ethyl-1,3-dimethylbenzene	2870-04-4	Annual	256	0.01								
2-methyl-1-butene	563-46-2	Annual	480	0.01								
3-methyl-1-butene	563-45-1	Annual	2200	0.00								
2-methylnaphthalene	91-57-6	Annual	20	0.07								
benzene	71-43-2	Annual	4.5	0.06								
isobutene	115-11-7	Annual	32000	0.09								
cis-piperylene	1574-41-0 542-92-7	Annual	200	0.00								
cyclopentadiene		Annual	200	0.01								
cyclopentane cyclopentene	287-92-3 142-29-0	Annual Annual	1700 370	0.00								
dicyclopentadiene	77-73-6	Annual	27	0.00								
directly sulfide	75-18-3	Annual	25	0.01								
ethylene	74-85-1	Annual	34	0.46								
n-hexane	110-54-3	Annual	200	0.03								
1-hexene	592-41-6	Annual	170	0.01								
indene	95-13-6	Annual	24	0.01								
isobutane	75-28-5	Annual	7100	0.01								
2-methylpentane	107-83-5	Annual	200	0.01								
isopentane	78-78-4	Annual	7100	0.02								
isoprene	78-79-5	Annual	120	0.00								
1-methylcyclopentadiene	26519-91-5	Annual	100	0.01								
1-methylcyclopentene	693-89-0	Annual	370	0.00								
m-methylstyrene	100-80-1	Annual	48	0.01								
naphthalene	91-20-3	Annual	50	0.12								
n-butane	106-97-8	Annual	7100	0.09								
n-decane	124-18-5 142-82-5	Annual	330	0.02								
n-heptane n-octane	111-65-9	Annual Annual	2700 540	0.01 0.08								
n-octane n-nonane	111-65-9	Annual	450	0.08								
n-pentane	109-66-0	Annual	7100	0.10								
n-propylbenzene	103-65-1	Annual	250	0.02								
1-pentene	109-67-1	Annual	480	0.01								
phenanthrene	85-01-8	Annual	0.8	0.00								
propane	74-98-6	Annual	Simple Asphyxiant	0.10								
propylene	115-07-1	Annual	Simple Asphyxiant	0.43						·		
styrene	100-42-5	Annual	140	0.01								
toluene	108-88-3	Annual	1200	0.06								
xylene	1330-20-7	Annual	180	0.03								

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [μg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full FSI	Was Step 6 relied on to fall out of the MERA?		Site Wide GLCni [µg/m³]
<u> </u>												
1							<del> </del>					
<u> </u>												
-							-					
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health I	Effect Results (	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [μg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [μg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	n Effect Results	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [μg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

25 % ESL 10% ESL 50% ESL 50% ESL 50% ESL 50% ESL 50% ESL 50% ESL 5tep 4 Production GLCmax Step 4 Production Step 4 MSS GLCmax 25% ESL Full ESL Step 3 Modeled GLCmax since most recent site wide Project Only GLCmax since most recent site Step 4 MSS Project Only Step 5 GLCmax Was Step 6 relied on to fall out of the Site Wide GLCmax Site	Modeled Health E	Effect Results (	MERA Guidance)	:	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
	Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax	since most recent site wide	Step 4 Production Project Only GLCmax	since most recent site	Step 4 MSS Project Only	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	[MERA Guidance]	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [μg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [μg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [μg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	S Only Step 6 Step 7: Site		Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]	

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health B	Effect Results	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [μg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [μg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health E	ffect Results (	MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full FSI	Was Step 6 relied on to fall out of the MERA?		Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health E	Effect Results	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [μg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [µg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Only Step 6 Step 7: Site Wide		
Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production	50% ESL Step 4 MSS GLCmax	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL	Was Step 6 relied on to fall out of the MERA?		Site Wide GLCni [μg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance)	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Step 6	Step 7: Site Wide	
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	Only Step 6 Step 7: Site Wide		
Chemical Species	CAS Number	Averaging Time		10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [μg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax [µg/m³]	Site Wide GLCni [µg/m³]
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Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance	):	Step 3	Step 4: Production		Step 4: MSS		Step 5: MSS Only	nly Step 6 Step 7: Site Wide		
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]	25 % ESL Step 4 Production GLCmax since most recent site wide modeling [µg/m³]	10% ESL Step 4 Production Project Only GLCmax [µg/m³]	50% ESL Step 4 MSS GLCmax since most recent site wide modeling [µg/m³]	25% ESL Step 4 MSS Project Only GLCmax [µg/m³]	Full ESL Step 5 GLCmax [μg/m³]	Was Step 6 relied on to fall out of the MERA?	Site Wide GLCmax	Site Wide GLCni [µg/m³]
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# **Electronic Modeling Evaluation Workbook for SCREEN3 Health Effect Modeling Results**

Date: \_9/26/2019 Permit #: \_\_1768

Company Name: \_\_Equistar

Administrative Information:								
Data Type:	Facility Information:							
Project Number:								
Permit Number:	1768							
Regulated Entity ID:	100542281							
Facility Name:	Equistar Channelview							
Company Name:	Equistar Chemicals, LP							
Company Contact Name:	Teresa Peneguy							
Company Contact Number:	281-452-8330							
County	Harrie							

This sheet documents the health effects review for Steps 3-7 of the Modeling Effects Review Applicability (MERA) Guidan

For modeling analyses which require modeling for health effects, fill in the information below. Note: Only steps of the MEF assigned permit reviewer to review

- I. Select the chemical species from the drop down. The list only includes those chemical species identified on the Special
- 2. Next, select the averaging time being evaluated from the drop down. The ESL will change according to the averaging til Based on these selections, the CAS number and ESL will auto populate.
- 4. Following the MERA guidance, start at Step 3 and continue through the row for each applicable Step of the MERA. If a
- . If the demonstration is complete ("fall out of the MERA") before reaching the end of the row, you do not need to continu

- I. Step 3 in this sheet assumes that a Unit Impact Modeling demonstration was conducted. To demonstrate compliance v
- SCREEN3 cannot be used to determine exceedance counts. Therefore, if exceedance counts are needed for Steps 5 or
- 3. The Chemical Species available in the drop down are based on the inputs from the "Speciated Emissions" sheet.
- 4. Do not insert, cut, or delete rows.

Tips:
1. For questions on what each step of the MERA requires, please see the following:

https://www.tceg.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/mera.pdf

Modeled Health	Effect Results	(MERA Guidance	):	Step 3
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]
2-sec-butyl-6-ethylaniline	71758-10-6	1-hr	100	122.00
2-sec-butyl-6-ethylaniline	71758-10-6	Annual	10	0.95

Facility:

Modeled Hea	Ith Effect Results	(MERA Guidance)	):	Step 3
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]
1,3-butadiene	106-99-0	1-hr	510	0.31
1,3-pentadiene	504-60-9	1-hr	2000	0.06
1-methyl-1H-indene	29036-25-7	1-hr	470	0.27
1-methylnaphthalene	90-12-0	1-hr	200	0.11
alkyl naphthalene	N/A	1-hr	200	0.39
2-butene	107-01-7	1-hr	10000	1.37
2-ethyl-1,3-dimethylbenzene	2870-04-4	1-hr	2560	0.15
2-methyl-1-butene	563-46-2	1-hr	290	0.08
3-methyl-1-butene	563-45-1	1-hr	290	0.05
2-methylnaphthalene	91-57-6	1-hr	200	0.90
benzene	71-43-2	1-hr	170	0.72
isobutene	115-11-7	1-hr	180000	1.15
cis-piperylene	1574-41-0	1-hr	2000	0.02
cyclopentadiene	542-92-7	1-hr	2000	0.07
cyclopentane	287-92-3	1-hr	17000	0.04
cyclopentene	142-29-0	1-hr	3700	0.04
dicyclopentadiene	77-73-6	1-hr	60	0.06
dimethyl sulfide	75-18-3	1-hr	7.6	0.10
ethylene	74-85-1	1-hr	1400	5.73
n-hexane	110-54-3	1-hr	5600	0.39
1-hexene	592-41-6	1-hr	1700	0.15
indene	95-13-6	1-hr	240	0.16
isobutane	75-28-5	1-hr	23000	0.08
2-methylpentane	107-83-5	1-hr	5600	0.08
isopentane	78-78-4	1-hr	59000	0.29
isoprene	78-79-5	1-hr	130	0.03
1-methylcyclopentadiene	26519-91-5	1-hr	1000	0.19
1-methylcyclopentene	693-89-0	1-hr	3700	0.02
m-methylstyrene	100-80-1	1-hr	250	0.12
naphthalene	91-20-3	1-hr	440	1.51
n-butane	106-97-8	1-hr	66000	1.12
n-decane	124-18-5	1-hr	1700	0.28
n-heptane	142-82-5	1-hr	10000	0.16

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Date:	_9/26/2019
Permit	t #:1768
Company Name:	Equistar

Modeled Healt	h Effect Results	(MERA Guidance	):	Step 3
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [μg/m³]
n-octane	111-65-9	1-hr	5600	1.02
n-nonane	111-84-2	1-hr	4800	0.62
n-pentane	109-66-0	1-hr	59000	1.19
n-propylbenzene	103-65-1	1-hr	2500	0.22
1-pentene	109-67-1	1-hr	290	0.15
phenanthrene	85-01-8	1-hr	8	0.05
propane	74-98-6	1-hr	Simple Asphyxiant	1.32
propylene	115-07-1	1-hr	Simple Asphyxiant	5.34
styrene	100-42-5	1-hr	110	0.15
toluene	108-88-3	1-hr	4500	0.72
xylene	1330-20-7	1-hr	2200	0.41
1,3-butadiene	106-99-0	Annual	9.9	0.02
1,3-pentadiene	504-60-9	Annual	200	0.00
1-methyl-1H-indene	29036-25-7	Annual	47	0.02
1-methylnaphthalene	90-12-0	Annual	20	0.01
Other (Please specify):		Annual		0.03

**Electronic Modeling Evaluation Workbook for SCREEN3 Health Effect Modeling Results** 

Modeled Heal	Modeled Health Effect Results (MERA Guidance):								
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [μg/m³]					
2-butene	107-01-7	Annual	480	0.11					
2-ethyl-1,3-dimethylbenzene	2870-04-4	Annual	256	0.01					
2-methyl-1-butene	563-46-2	Annual	480	0.01					
3-methyl-1-butene	563-45-1	Annual	2200	0.00					
2-methylnaphthalene	91-57-6	Annual	20	0.07					
benzene	71-43-2	Annual	4.5	0.06					
isobutene	115-11-7	Annual	32000	0.09					
cis-piperylene	1574-41-0	Annual	200	0.00					
cyclopentadiene	542-92-7	Annual	200	0.01					
cyclopentane	287-92-3	Annual	1700	0.00					
cvclopentene	142-29-0	Annual	370	0.00					
dicyclopentadiene	77-73-6	Annual	27	0.01					
dimethyl sulfide	75-18-3	Annual	25	0.01					
ethylene	74-85-1	Annual	34	0.46					
n-hexane	110-54-3	Annual	200	0.03					
1-hexene	592-41-6	Annual	170	0.01					
indene	95-13-6	Annual	24	0.01					
isobutane	75-28-5	Annual	7100	0.01					
2-methylpentane	107-83-5	Annual	200	0.01					
isopentane	78-78-4	Annual	7100	0.02					
isoprene	78-79-5	Annual	120	0.00					
1-methylcyclopentadiene	26519-91-5	Annual	100	0.01					
1-methylcyclopentene	693-89-0	Annual	370	0.00					
m-methylstyrene	100-80-1	Annual	48	0.01					
naphthalene	91-20-3	Annual	50	0.12					
n-butane	106-97-8	Annual	7100	0.09					
n-decane	124-18-5	Annual	330	0.02					
n-heptane	142-82-5	Annual	2700	0.01					
n-octane	111-65-9	Annual	540	0.08					
n-nonane	111-84-2	Annual	450	0.05					
n-pentane	109-66-0	Annual	7100	0.10					
n-propylbenzene	103-65-1	Annual	250	0.02					
1-pentene	109-67-1	Annual	480	0.01					
phenanthrene	85-01-8	Annual	0.8	0.00					
propane	74-98-6	Annual	Simple Asphyxiant	0.10					
propylene	115-07-1	Annual	Simple Asphyxiant	0.43					
etyropo	100 42 5	Annual	140	0.01					

Annual

Annual Annual

100-42-5

108-88-3 1330-20-7

0.8 Simple Asphyxiant
Simple Asphyxiant
140
1200

0.43 0.01 0.06 0.03

styrene

toluene xylene

Electronic Modeling Evaluation Workbook for SCREEN3

Modeling File Names

Date: \_9/26/2019 Permit #: \_\_1768 Company Name: \_\_Equistar

## Facility:

Model File Base Name	Pollutant	Averaging Time	File Extensions	Additional File Description
Area	generic	1-hr	.s3i	fugitive source
OP1 HV	generic	1-hr	.s3i	flare

EPN Model ID GLCmax @ 1 lb/hr

ug/m3

ug/m3

38E01 38E01 0.24 max beyond property line 0.2436

F34E00 F34E00 41.50 @ property line 420m 24.9000 components < 10 m, applied 0.6 factor per TCEQ memo

multiplier 0.08

**Emissions Increase** 

EPN		48E01	F34E00	GLCmax	ESL	< 10%	48E01	F34E00	GLCmax	Cmax annı	ESL	< 10%
		Project Increase	PBR incorpora tion			ESL	Project Increase	PBR incorpora tion				ESL
		lb/hr	lb/hr	ug/m3	ug/m3		tpy	tpy	ug/m3	ug/m3	ug/m3	
NOx		16.65		4.056			19.37		1.077	0.0862		
СО		85.75		20.889			99.79		5.550	0.4440		
SO2		14.23		3.466			5.59		0.311	0.0249		
1,3-butadiene	106-99-0		0.01	0.311	510	Yes		0.05	0.311	0.0249	9.9	Yes
1,3-Methylpentadiene	504-60-9		0.00	0.059	2000	Yes		0.01	0.059	0.0047	200.0	Yes
1-Methylindene	29036-25-7		0.01	0.266	470	Yes		0.05	0.266	0.0213	47.0	Yes
1-Methylnaphthalene	90-12-0		0.00	0.106	200	Yes		0.02	0.106	0.0085	20.0	Yes
1-N-Decylnaphthalene	N/A		0.02	0.392	200	Yes		0.07	0.392	0.0313	20.0	Yes
2-Butene	107-01-7		0.05	1.369	10000	Yes		0.24	1.369	0.1095	480.0	Yes
2-ethyl-m-xylene	2870-04-4		0.01	0.148	2560	Yes		0.03	0.148	0.0118	256.0	Yes
2-methyl-1-butene	563-46-2		0.00	0.081	290	Yes		0.01	0.081	0.0065	480.0	Yes
2-methyl-3-butene	563-45-1		0.00	0.045	290	Yes		0.01	0.045	0.0036	2200.0	Yes
2-Methylnaphthalene	91-57-6		0.04	0.901	200	Yes		0.16	0.901	0.0721	20.0	Yes
Benzene	71-43-2		0.03	0.721	170	Yes		0.13	0.721	0.0577	4.5	Yes
Butylenes	115-11-7		0.05	1.146	180000	Yes		0.20	1.146	0.0916	32000.0	Yes
cis-1,3-pentadiene	1574-41-0		0.00	0.025	2000	Yes		0.00	0.025	0.0020	200.0	Yes
cyclopentadiene	542-92-7		0.00	0.069	2000	Yes		0.01	0.069	0.0055	200.0	Yes
cyclopentane	287-92-3		0.00	0.035	17000	Yes		0.01	0.035	0.0028	1700.0	Yes
cyclopentene	142-29-0		0.00	0.044	3700	Yes		0.01	0.044	0.0035	370.0	Yes
DCPD	77-73-6		0.00	0.064	60	Yes		0.01	0.064	0.0051	27.0	Yes
Di-Methylsulfide	75-18-3		0.00	0.101	7.6	Yes		0.02	0.101	0.0080	25.0	Yes
Ethylene	74-85-1		0.23	5.734	1400	Yes		1.01	5.734	0.4587	34.0	Yes
HEXANE	110-54-3		0.02	0.391	5600	Yes		0.07	0.391	0.0313	200.0	Yes
HEXENE	592-41-6		0.01	0.151	1700	Yes		0.03	0.151	0.0121	170.0	Yes
indene	95-13-6		0.01	0.161	240	Yes		0.03	0.161	0.0129	24.0	Yes
isobutane	75-28-5		0.00	0.080	23000	Yes		0.01	0.080	0.0064	7100.0	Yes
Isohexanes	107-83-5		0.00	0.081	5600	Yes		0.01	0.081	0.0065	200.0	Yes
Isopentane	78-78-4		0.01	0.293	59000	Yes		0.05	0.293	0.0235	7100.0	Yes

Isoprene	78-79-5		0.00	0.027	130	Yes		0.00	0.027	0.0022	120.0	Yes
Methyl-Cyclo-Pentadienes	26519-91-5		0.01	0.185	1000	Yes		0.03	0.185	0.0148	100.0	Yes
Methyl-Cyclo-Pentene	693-89-0		0.00	0.022	3700	Yes		0.00	0.022	0.0018	370.0	Yes
m-methyl-styrene	100-80-1		0.00	0.119	250	Yes		0.02	0.119	0.0095	48.0	Yes
naphthalene	91-20-3		0.06	1.505	440	Yes		0.26	1.505	0.1204	50.0	Yes
n-butane	106-97-8		0.05	1.123	66000	Yes		0.20	1.123	0.0898	7100.0	Yes
n-decane	124-18-5		0.01	0.277	1700	Yes		0.05	0.277	0.0222	330.0	Yes
N-Heptane	142-82-5		0.01	0.162	10000	Yes		0.03	0.162	0.0130	2700.0	Yes
N-Octane	111-65-9		0.04	1.019	5600	Yes		0.18	1.019	0.0815	540.0	Yes
Nonane	111-84-2		0.02	0.619	4800	Yes		0.11	0.619	0.0495	450.0	Yes
n-pentane	109-66-0		0.05	1.189	59000	Yes		0.21	1.189	0.0952	7100.0	Yes
n-propyl benzene	103-65-1		0.01	0.216	2500	Yes		0.04	0.216	0.0172	250.0	Yes
PENTENE	109-67-1		0.01	0.150	290	Yes		0.03	0.150	0.0120	480.0	Yes
Phenanthrene	85-01-8		0.00	0.050	8.0	Yes		0.01	0.050	0.0040	0.8	Yes
Propane	74-98-6	1.32	0.04	1.319	ple Asphyx	iant	4.3	0.18	1.236	0.0989	ple Asphyx	iant
PROPYLENE	115-07-1		0.21	5.336	ple Asphyx	iant		0.94	5.336	0.4269	ple Asphyx	iant
Styrene	100-42-5		0.01	0.154	110	Yes		0.03	0.154	0.0123	140.0	Yes
Toluene	108-88-3		0.03	0.722	4500	Yes		0.13	0.722	0.0578	1200.0	Yes
Xylene	1330-20-7		0.02	0.411	2200	Yes		0.07	0.411	0.0329	180.0	Yes

	1-hr	=	3-	hr	8-	hr	24-	-hr	Ann	ıual
	multiplier	ug/m3								
NO2	0.9	3.65							0.08	0.29
СО	1	20.89			0.7	14.62			0.08	1.67
SO2	1	3.47	0.9	3.12		•	0.4	1.39	0.08	0.28

# **Preliminary Determination Summary**

Equistar Chemicals, LP Permit Numbers 2128 and N1280

## I. Applicant

Equistar Chemicals LP PO Box 777 Channelview, TX 77530-0777

## II. Project Location

Channelview Complex 8280 Sheldon Road Harris County Channelview, Texas 77530

## III. Project Description

Equistar submitted an amendment to authorize additional natural gas for the flare (EPN 38E01) in anticipation of the proposed amendments to the 2002 Ethylene Production National Emission Standards for Hazardous Air Pollutants (NESHAP). Additionally, Permit by Rule (PBR) Registration Nos. 107709, 153580, 150031, 157735, 149329, and 155486, and Standard Permit Nos. 143753, 144030, and 157394 will be incorporated by consolidation. No increases in emissions from maintenance, startup, and shutdown (MSS) activities are included in this project.

## IV. Emissions

Air Contaminant	Proposed Allowable Emission Rates (tpy)
VOC	435.35
NO <sub>x</sub>	56.63
SO <sub>2</sub>	8.30
CO	261.29
PM	3.90
PM <sub>10</sub>	3.90
PM <sub>2.5</sub>	3.90

## V. Federal Applicability

The following chart illustrates the annual project emissions for each pollutant and whether this pollutant triggers PSD or Nonattainment (NA) review.

Page 2

Pollutant	Project Emissions (tpy)	Major Mod Trigger (tpy)	NA Triggered Y/N	PSD Triggered Y/N
voc	0.72	25 for NA 40 for PSD	N	Ν
NOx	9.11	25 for NA 40 for PSD	Y	N
SO <sub>2</sub>	3.37	40	N/A	N
СО	46.44	100	N/A	N

The site is located in Harris County, which has been designated as a serious nonattainment area for ozone. The Channelview Complex is an existing major source of VOC and  $NO_X$ , and the project will result in a significant net increase of  $NO_X$ .

The Channelview Complex is a named source. The site is located in an attainment area for at least one pollutant, and is an existing major stationary source. The project emission increases are below the applicable significant significance threshold in 40 CFR § 52.21(b)(23)(i) for VOC, SO<sub>2</sub>, and CO. PSD BACT and air quality analysis (AQA) requirements do not apply.

Pollutant	Project Increase (tpy) <sup>1</sup>	NA Netting Trigger (tpy)	PSD Netting Trigger (tpy)	Netting Required Y/N	Net Emission Change (tpy) <sup>2</sup>	Major Mod Trigger (tpy)	PSD Triggered Y/N	NA Triggered Y/N
VOC <sup>3</sup>	0.72	5	40	N	N/A	25	N	N
NOx 3,4	9.11	5	40	Υ	105.43	25	N	Υ
SO <sub>2</sub> <sup>4</sup>	3.37	N/A	40	N	N/A	40	N	N
СО	46.44	N/A	100	N	N/A	100	N	N

- Project Increases: Comparison of Baseline Actual to PTE (or Projected Actual) Increases only
- Net Emissions: Baseline Actual to PTE (or Projected Actual) for the project currently under review, Baseline Actual to PTE for all other increases and decreases within netting window.
- Ozone precursor. Either pollutant precursor can trigger BACT/LAER and impacts analysis, as applicable.

Page 3

PM<sub>2.5</sub> precursor. Not used to trigger PM<sub>2.5</sub> BACT/LAER or impacts analysis at this time.

## VI. Control Technology Review

A control technology review is required for all new and modified sources. The following controls required by the permits satisfy LAER for emissions of NOx, based on a review of recently issued permits from Texas and other states, and consideration of RACT/BACT/LAER Clearinghouse (RBLC) data provided by the applicant.

## Flare

The flare is designed to meet the requirements of 40 CFR Part 60.18 and to achieve a VOC compound destruction efficiency of 99% for compounds with up to three carbons, and 98% for compounds with four or more carbon atoms. The flare is equipped with a continuous flow monitor and composition analyzer.

## VII. Air Quality Analysis

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

## A. Minor Source NSR and Air Toxics Review

Table 1. Project-Related Modeling Results for State Property Line

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	0.19	14.3

 Table 2. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	0.19	7.8
SO <sub>2</sub>	3-hr	0.17	25
SO <sub>2</sub>	24-hr	0.08	5
SO <sub>2</sub>	Annual	0.02	1
NO <sub>2</sub>	1-hr	2.26	7.5

Page 4

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
NO <sub>2</sub>	Annual	0.18	1
СО	1-hr	10.14	2,000
СО	8-hr	7.10	500

The GLC<sub>max</sub> are the maximum predicted concentration associated with one year of meteorological data.

The justification for selecting the EPA's interim 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> De Minimis levels was based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> De Minimis levels. As explained in EPA guidance memoranda<sup>1,2</sup>, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> NAAQS.

#### VIII. Offsets

The site is located in Harris County, which has been designated as a serious nonattainment area for ozone. The Channelview Complex is an existing major source of VOC and  $NO_X$ , and the project will result in a significant net increase of  $NO_X$ .

When issued, the permit requires that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H.

The permit holder shall use 10.9 tons per year (tpy) of  $NO_X$  credits to offset the 9.1 tpy  $NO_X$  project emission increase for the facilities authorized by this permit at a ratio of 1.2 to 1.0.

Prior to the commencement of operation, the permit holder is required to obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits

www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf

www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

Page 5

Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.

# IX. Alternative Site Analysis and Compliance Certification

The applicant has submitted the required demonstration relating to consideration of alternative sites and Clean Air Act compliance status for sites owned or operated by the applicant (or by any entity controlling, controlled by, or under common control with the applicant). The analysis demonstrated that the benefits of the proposed location and source configuration significantly outweigh the environmental and social costs of that location.

## X. Conclusion

As described above, the applicant has demonstrated that the project meets all applicable rules, regulations and requirements of the Texas and Federal Clean Air Acts. The Executive Director's preliminary determination is that the permits should be issued.

#### **Special Conditions**

#### Permit Numbers 2128 and N280

#### **Emission Limitations**

- This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in the special conditions of this permit.
- 2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compound (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the maximum allowable emission rates table (MAERT). Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions. In addition, the following safety valves are exempt from above condition.

Tag Number	Service	Set Pressure	Operating. Pressure
PSV-07709	TK-41	60	40
PSV-07710	TK-41	60	40
PSV-07711	TK-42	60	40
PSV-07712	TK-42	60	40
PSV-07722	TK-43	60	40
PSV-07723	TK-43	60	40
PSV-07724	TK-44	60	40
PSV-07725	TK-44	60	40
PSV-07733	D-77	50	30
PSV-08028	TK-6	71	40
PSV-08029	TK-6	71	40
PSV-08030	TK-11	57	40
PSV-08031	TK-11	57	40
PSV-08124	TK-20X	123	10
PSV-08125	TK-20X	123	10
PSV-12052	T-1205	158	70

### Maintenance, Start-Up, and Shutdown Operations

3. This permit authorizes emissions from Emission Point No. 17E01 for the following planned maintenance, start-up, and shutdown activities from the C5 Recovery, Alkylation, MTBE, and C4 recovery areas. The activities include:

Unit Shutdown/Startup (includes total or partial unit shutdowns/startups) 30 times/year. System and equipment maintenance for the following:

Heat Exchanger System, Compressor System, Process Tower System, Process Drum System, Process Tanks, Level Instrumentation System, Flow Instrumentation System, Pressure Instrumentation System, Temperature Instrumentation System, Coalescer System, Process Additive System, Analyzer System, Process Pump System, Process Filter System, Reactors and their associated equipment and piping authorized by the amendment application dated July 13, 2011.

These emissions and activities are subject to the maximum allowable emission rates indicated on the MAERT. Any maintenance, start-up, and shutdown activities not in the above list are not authorized by this permit.

Routine maintenance activities attributable to the described equipment may be tracked through work orders or their equivalent. Emissions from these activities shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit application.

- 4. The process equipment identified in Special Condition (SC) No. 3 shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements:
  - A. The process equipment shall be depressurized to a control device, transferred within the process unit, transferred to another process unit, transferred to a pressurized storage tank, or depressurized to a controlled recovery system prior to venting to atmosphere, degassing, or draining liquid. Equipment that only contains material that is liquid with volatile organic compounds (VOC) partial pressure less than 0.50 pound per square inch, absolute (psia) at the highest of the actual temperature or 95°F may be opened to atmosphere and drained in accordance with Paragraph C of this special condition. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded.
  - B. If mixed phase materials must be removed from process equipment, the cleared material shall be routed to a knockout drum or equivalent to allow for managed initial phase separation, transferred within the process unit, transferred to another process unit, or transferred to a pressurized storage tank. If the VOC partial pressure is greater than 0.50 psi at either the actual temperature or 95°F, any vents in the system must be routed to a control device or a controlled recovery system. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. Control must remain in place until degassing has been completed or the system is no longer vented to atmosphere.
  - C. All liquids from process equipment or storage vessels must be removed to the maximum extent practical prior to opening equipment to commence degassing and/or maintenance. Liquids must be drained into a closed vessel or closed liquid recovery system unless prevented by the physical configuration of the equipment, transferred within the process unit, transferred to another process unit, or transferred to a pressurized or an atmospheric storage tank. If it is necessary to drain liquid into an open pan or sump, the liquid must be covered or transferred to a covered vessel within one hour of being drained.
  - D. If the VOC partial pressure is greater than 0.50 psi at the normal process temperature or 95°F, facilities shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the control device or controlled recovery system to the extent allowed by process equipment or storage vessel design. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. The facilities to be degassed shall not be vented directly to atmosphere, except as necessary to establish isolation of the work area or to monitor VOC concentration following controlled depressurization. The venting shall be minimized to the maximum extent practicable and actions taken recorded. The control device or recovery system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.

- (1) For MSS activities identified as routine maintenance activities in SC No. 3, the following option may be used in lieu of item (2) below. The facilities being prepared for maintenance shall not be vented directly to atmosphere until the VOC concentration has been verified to be less than 10,000 ppmv or less than 10 percent of the lower explosive limit (LEL) per the site safety procedures.
- The locations and/or identifiers where the purge gas or steam enters the process (2) equipment or storage vessel and the exit points for the exhaust gases shall be recorded (process flow diagrams [PFDs] or piping and instrumentation diagrams [P&IDs] may be used to demonstrate compliance with the requirement). If the process equipment is purged with a gas, two system volumes of purge gas must have passed through the control device or controlled recovery system before the vent stream may be sampled to verify acceptable VOC concentration prior to uncontrolled venting. The VOC sampling and analysis shall be performed using an instrument meeting the requirements of SC No. 5. The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged. The facilities shall be degassed to a control device or controlled recovery system until the VOC concentration is less than 10,000 ppmv or 10 percent of the LEL. Documented site procedures used to de-inventory equipment to a control device for safety purposes (e.g., hot work or vessel entry procedures) that achieve at least the same level of purging may be used in lieu of the above.
- E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:
  - (1) It is not technically practicable to depressurize or degas, as applicable, into the process;
  - (2) There is not an available connection to a plant control system (flare); and
  - (3) There is no more than 50 lbs of air contaminant to be vented to atmosphere during shutdown or start-up, as applicable.
    - All instances of venting directly to atmosphere per E of this condition must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those planned MSS activities identified in SC No. 3.
- 5. Air contaminant concentration shall be measured using an instrument/detector meeting one set of requirements specified below.
  - A. VOC concentration shall be measured using an instrument meeting all the requirements specified in EPA Method 21 (40 CFR Part 60, Appendix A) with the following exceptions:
    - (1) The instrument shall be calibrated within 24 hours of use with a calibration gas such that the response factor (RF) of the VOC (or mixture of VOCs) to be monitored shall be less than 2.0. The calibration gas and the gas to be measured, and its approximate RF shall be recorded. If the RF of the VOC (or mixture of VOCs) to be monitored is greater than 2.0, the VOC concentration shall be determined as follows:
      - VOC Concentration = Concentration as read from the instrument\*RF

In no case should a calibration gas be used such that the RF of the VOC (or mixture of VOCs) to be monitored is greater than 5.0.

- (2) Sampling shall be performed as directed by this permit in lieu of section 8.3 of Method 21. During sampling, data recording shall not begin until after two times the instrument response time. The date and time shall be recorded, and VOC concentration shall be monitored for at least five minutes, recording VOC concentration each minute. As an alternative the VOC concentration may be monitored over a five-minute period with an instrument designed to continuously measure concentration and record the highest concentration read. The highest measured VOC concentration shall be recorded and shall not exceed the specified VOC concentration limit prior to uncontrolled venting.
- B. Colorimetric gas detector tubes may be used to determine air contaminant concentrations if they are used in accordance with the following requirements.
  - (1) The air contaminant concentration measured as defined in (3) is less than 80 percent of the range of the tube and is at least 20 percent of the maximum range of the tube.
  - (2) The tube is used in accordance with the manufacturer's guidelines.
  - (3) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting:

measured contaminant concentration (ppmv) < release concentration.

Where the release concentration is:

10,000\* mole fraction of the total air contaminants present that can be detected by the tube.

The mole fraction may be estimated based on process knowledge. The release concentration and basis for its determination shall be recorded.

Records shall be maintained of the tube type, range, measured concentrations, and time the samples were taken.

- C. Lower explosive limit measured with a lower explosive limit detector.
  - (1) The detector shall be calibrated within 30 days prior to use with a certified pentane gas standard at 58 percent of the LEL for pentane. Records of the calibration date/time and calibration result (pass/fail) shall be maintained.
  - (2) A functionality test shall be performed within 24 hours prior to use on each detector using the same certified gas standard used for calibration. The LEL monitor shall read no lower than 90 percent of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.
  - (3) A certified methane gas standard equivalent to 58 percent of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95 percent of that for pentane.
- D. Gas Chromatograph. As an alternative to an instrument/detector, the analysis may be conducted in a laboratory. Bag samples of the gas discharged may be drawn and taken to an onsite laboratory to be analyzed by gas chromatography (GC). A minimum of two bag samples shall be drawn approximately ten minutes apart. A Tedlar bag, or a bag or glass container appropriate for the material to be sampled, shall be used and shall have a valve to seal gas in the bag or container. The samples shall be drawn as follows:

- (1) The sample point on the equipment being cleared shall be purged sufficiently to ensure a representative sample at the sample valve.
- (2) The sample bag shall be connected directly to the sample valve or to a pump that is connected directly to the sample valve.
- (3) The sample valve and sample bag shall be opened to allow the bag to fill to approximately 80% of capacity. The sample connections shall be fitted such that no air is drawn into the sample bag.
- (4) The two valves shall then be closed to seal the sample in the bag.
- (5) The sample bag shall then be disconnected and placed in a dark container out of direct sunlight for transport to the analyzer.
- (6) This process is repeated to collect additional samples.
- (7) The sample shall be analyzed within 12 hours of collection.
- (8) If condensation is observed in a bag sample, the sampling must be repeated using one of the modified bag sampling procedures in 40 CFR 60, Appendix A, Method 18 Section 8.
- (9) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting.
  - The laboratory GC shall meet or exceed the requirements of 40 CFR 60, Appendix A, Method 18 Sections 6 (Equipment and Supplies), 7 (Reagents and Standards), 9 (Quality Control), and 10 (Calibration and Standards). The sample shall be analyzed per Section 8.2.1.5 of Method 18, except the analysis of each bag may be performed in duplicate and use gas tight syringe through septums. The highest measured VOC concentration shall not exceed the specified VOC concentration limit prior to uncontrolled venting. The recovery study for bag sampling and post analysis calibration is only required the first time a vessel is degassed and analyzed if the procedure meets the accuracy specifications of Method 18 and the analytical equipment is not modified. If the material content, temperature and pressure are the same among multiple vessels when sampling occurs, the post analysis calibration need only be conducted on sample(s) from one representative vessel.
- 6. This condition applies only to piping and components subject to leak detection and repair monitoring requirements identified in other air permits. Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period:
  - A. A cap, blind flange, plug, or second valve must be installed on the line or valve; or
  - B. The open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once within the 72-hour period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other

situations, leaks are indicated by readings 500 ppmv above background and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

- 7. Additional occurrences of MSS activities authorized by this permit may be authorized under permit by rule only if conducted in compliance with this permit's procedures, emission controls, monitoring, and recordkeeping requirements applicable to the activity.
- 8. Control devices required by this permit for emissions from planned MSS activities are limited to those types identified in this condition. Control devices shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. Each device used must meet all the requirements identified for that type of control device.

Controlled recovery systems identified in this permit shall be directed to an operating plant process or to a collection system that is vented through a control device meeting the requirements of this permit condition.

- A. Plant Flare System The plant flare system shall comply with all requirements specified in Special Condition No. 11 of this permit.
- B. Thermal Oxidizer The thermal oxidizers shall comply with all requirements specified in Special Condition No. 12 of this permit.
- 9. With the exception of the MAERT limits, these permit conditions become effective 180 days after this permit has been issued. During this period, monitoring and recordkeeping shall satisfy the requirements of SC No. 3. Emissions shall be estimated using good engineering practice and methods to provide reasonably accurate representations for emissions. The basis used for determining the quantity of air contaminants to be emitted shall be recorded.
- 10. Planned maintenance activities must be conducted in a manner consistent with good practice for minimizing emissions, including the use of air pollution control equipment, practices and processes. All reasonable and practical efforts to comply with SC Nos. 3 through 10 must be used when conducting the planned maintenance activity, until the Commission determines that the efforts are unreasonable or impractical, or that the activity is an unplanned maintenance activity.

### **Emission Standards and Operating Specifications**

- 11. The East Plant Flare (EPN 17E01) shall be designed and operated in accordance with the following requirements:
  - A. The flare systems shall be designed such that the combined assist natural gas and waste stream to each flare meets the Code of Federal Regulation (40 CFR) § 60.18 specifications of minimum heating value and maximum tip velocity under normal, upset, and maintenance flow conditions.
    - The heating value and velocity requirements shall be satisfied during operations authorized by this permit. Flare testing per 40 CFR § 60.18(f) may be requested by the appropriate regional office to demonstrate compliance with these requirements.
  - B. The flare shall be operated with a flame present at all times and/or have a constant pilot flame. The pilot flame shall be continuously monitored by a thermocouple or an infrared

monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at a frequency in accordance with, the manufacturer's specifications.

- C. Each flare shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. This shall be ensured by the use of steam or air assist to the flare.
- D. The permit holder shall install a continuous flow monitor and composition analyzer that provide a record of the vent stream flow and composition (total VOC or Btu content) to the flare. The flow monitor sensor and analyzer sample points shall be installed in the vent stream as near as possible to the flare inlet such that the total vent stream to the flare is measured and analyzed. Readings shall be taken at least once every 15 minutes and the average block hourly values of the flow and composition shall be recorded each hour at least 95 percent of the time the flare is operational. The monitors shall be calibrated on an annual basis to meet the following accuracy specifications: the flow monitor shall be ±5.0%, temperature monitor shall be ±2.0% at absolute temperature, and pressure monitor shall be ±5.0 mm Hg.

Calibration of the analyzer shall follow the procedures and requirements of Section 10.0 of 40 CFR Part 60, Appendix B, Performance Specification 9, as amended through October 17, 2000 (65 FR 61744), except that the multi-point calibration procedure in Section 10.1 of Performance Specification 9 shall be performed at least once every calendar quarter instead of once every month, and the mid-level calibration check procedure in Section 10.2 of Performance Specification 9 shall be performed at least once every calendar week instead of once every 24 hours. The calibration gases used for calibration procedures shall be in accordance with Section 7.1 of Performance Specification 9. Net heating value of the gas combusted in the flare shall be calculated according to the equation given in 40 CFR § 60.18(f)(3) as amended through October 17, 2000 (65 FR 61744).

The monitors and analyzers shall operate as required by this section at least 95 percent of the time when the flare is operational, averaged over a rolling 12 month period. Flared gas net heating value and actual exit velocity determined in accordance with 40 CFR  $\S$  60.18(f)(4) shall be recorded at least once every 15 minutes at least 95 percent of the time the flare is operational. Block hourly mass emission rates shall be determined and recorded using the above readings and the emission factors (NO<sub>x</sub> and CO) used in the permit amendment application, PI-1 dated April 27, 2005.

- E. During unit shutdowns and startups, waste gas flow and assist gas shall be monitored when degassing process units to ensure adequate Btu/scf at the flare tip.
- F. The East Plant Flare (EPN 17E01) shall operate in accordance with the 40 CFR 63 Subpart YY "National Emission Standards for Hazardous Air Pollutants: Generic Maximum Achievable Control Technology Standards Residual Risk and Technology Review for Ethylene Production" signed by the EPA Administrator as a final rule on March 12, 2020, the subsequently promulgated final version of that subpart, and Alternate Method of Control (AMOC) No. 157 issued May 12, 2020. Compliance with the requirements of this paragraph shall begin December 31, 2020 and occur as otherwise specified in the AMOC. Prior to the compliance requirements and schedule of this paragraph, Special Condition Nos. 11.A through 11.E shall apply. (TBD)

#### **Thermal Oxidizers**

- 12. The oxidizers shall maintain the VOC concentration in the exhaust gas at less than 10 ppmv on a dry basis, corrected to 3 percent oxygen, or achieve a VOC destruction efficiency greater than 99.9 wt.- %.
  - A. The oxidizer firebox exit temperature shall be maintained at not less than 1400°F, the exhaust oxygen concentration at not less than 3 mol.-% while waste gas is fed into the oxidizer.
  - B. The oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurement device shall reduce the temperature readings to an averaging period of 15 minutes or less and record it at that frequency. The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5°C.
  - C. Quality assured (or valid) data must be generated when the oxidizer is operating except during the performance of a daily zero and span check Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the oxidizer operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.
  - D. As an alternative to operational compliance with paragraph A of this condition, results of stack testing on the thermal oxidizers may be used to demonstrate that their performance meets this condition's exit concentration and destruction efficiency requirements for VOC (i.e., maximum 10 ppmv exit concentration, minimum 99.9 wt.-% DRE).
    - The test results may be used to determine the minimum exhaust temperature, minimum exhaust oxygen concentration, and minimum residence time at which compliance with the VOC exit concentration and DRE requirements is demonstrable while waste gas is being fed to the oxidizers.
    - Stack VOC concentrations and flow rates shall be measured in accordance with applicable United States Environmental Protection Agency (EPA) Reference Methods. A copy of the test report shall be maintained with the thermal oxidizers, and a summary of the testing results shall be included with the emission calculations.
- 13. The wastewater system associated with this permit shall be routed to the Environmental Control Unit for treatment or disposal.
- 14. Fuel for the heaters and flare shall be either sweet natural gas or low sulfur fuel gas containing no more than 5 grains total sulfur and 0.25 grain hydrogen sulfide per 100 dry standard cubic feet. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
- 15. Atmospheric relief valves in VOC service that are not equipped with rupture discs shall be checked for leaks on a quarterly basis with an approved gas analyzer. A leak shall be defined as 500 parts per million by volume (ppmv); there shall be no variance for inaccessible valves. All leaking valves

shall be repaired or replaced at the earliest opportunity, but not later than the next scheduled process shutdown.

#### Piping, Valves, Connectors, Pumps, and Compressors in contact with VOC - 28VHP Program

- 16. Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment.
  - A. These conditions shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 pound per square inch, absolute at 68°F or (2) the operating pressure is at least 5 kilopascals (0.725 pound per square inch) below ambient pressure. Equipment excluded from this condition shall be identified in a list to be made available upon request.
  - B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
  - C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
  - D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined by 30 TAC Chapter 115, shall be identified in a list to be made available upon request.
  - E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.
    - Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.
  - F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.
    - An approved gas analyzer shall conform to requirements listed in 40 CFR § 60.485(a)-(b).
    - Replaced components shall be re-monitored within 15 days of being placed back into VOC service.
  - G. Except as may be provided for in the special conditions of this permit, all pump and compressor seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an

automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump and compressor seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired.
- I. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. The TCEQ Executive Director, at his discretion, may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown.
- J. The results of the required fugitive instrument monitoring and maintenance program shall be made available to the TCEQ Executive Director or his designated representative upon request or any other air pollution control agency having jurisdiction over the facility. Records shall indicate appropriate dates, test methods, instrument readings, repair results, and corrective actions taken for all components. Records of physical inspections are not required unless a leak is detected.
- K. Alternative monitoring frequency schedules of 30 TAC §§ 115.352-115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard, or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.

#### 28CNTA (Connectors Inspected Annually)

17. In addition to the weekly physical inspection required by Special Condition No. 16, all connectors in gas/vapor and light liquid service shall be monitored annually with an approved gas analyzer in accordance with Items F thru J of Special Condition No. 16. Alternative monitoring frequency schedules ("skip options") of Title 40 Code of Federal Regulations Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, may be used in lieu of the monitoring frequency required by this permit condition. Compliance with this condition does not assure compliance with requirements of applicable state or federal regulation and does not constitute approval of alternative standards for these regulations.

#### **Compliance Assurance Monitoring**

18. The following requirements apply to capture systems for EPN 17E01 (East Plant Flare):

- A. If the capture system is used to control pollutants other than particulate matter, the permit holder shall either:
  - (1) Conduct a monthly visual, audio, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system; or
  - (2) Conduct an annual inspection of the capture system (in accordance with 40 CFR Part 60, Appendix A, Test Method 21) to verify that it is leak-free. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppmv above background.
- B. If the control device has a bypass, it shall comply with either of the following requirements:
  - (1) The bypass system shall be equipped with a flow indicator that records and verifies zero flow at least once every fifteen minutes immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere; or
  - (2) The bypass system valves shall be inspected at least once a month to verify the position of the valves, and that the condition of the car seals prevents flow out the bypass.
    - A deviation shall be reported if the monitoring or inspections indicate bypass of the control device.
- C. The date and results of each inspection performed shall be recorded. If the results of any inspection are not satisfactory, the deficiencies shall be recorded and the permit holder shall make every reasonable effort to repair a leaking component within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown.
- 19. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are excluded from the requirements of Special Condition No. 18.

#### Other Requirements

- 20. Total production of C4 products, including butadiene and raffinate (butenes and butylenes), shall not exceed representation on the Table 2 which was submitted with the amendment application dated July 13, 2011. Records shall be kept of the annual production rates.
- 21. The holder of this permit shall maintain records on the operation of the facility for each mode of production. Records shall include (but are not limited to) hours of operation, production rates, hours of operation of each heater unit and type of fuel used in firing each heater, time period pre-regeneration gases are purged to each flare unit, and time period regeneration cycle emits to the atmosphere.

### Permit by Rule Authorizations

22. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106):

Authorization	Source or Activity
PBR Registration Number 96384	Authorized the use of diethyl hydroxylamine (DEHA) as a polymer inhibitor in the C4 Unit.

## **Netting & Offsets**

- 23. NNSR Permit Number N142M1 is issued/approved based on the requirement that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H. (TBD)
  - A. The permit holder shall use 10.9 tons per year (tpy) of  $NO_X$  credits to offset the 9.1 tpy  $NO_X$  project emission increase for the facilities authorized by this permit at a ratio of 1.2 to 1.0.
  - B. Prior to the commencement of operation, the permit holder shall obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.

Date:	TBD	

#### Emission Sources - Maximum Allowable Emission Rates

#### Permit Numbers 2128 and N280

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

Air Contaminants Data

- · · · - · · · · · · · · · · · · · · ·	Air Contaminants Data	Air Contaminant Name	Emission Rates	
Emission Point No. (1)	Source Name (2)	(3)	lbs/hour	TPY (4)
EC4D3001	D-3001 Analyzer Vent	VOC	0.19	0.85
EC4PV1304	Analyzer Vent	VOC	0.01	0.01
EC4PV1309	Analyzer Vent	VOC	0.01	0.01
EC4PV1317	Analyzer Vent	VOC	0.01	0.01
EC4PV11205	Analyzer Vent	VOC	0.01	0.01
EC4PV11206	Analyzer Vent	VOC	0.01	0.01
EC4TPV11204	Analyzer Vent	VOC	0.01	0.01
EC4TPV11207	Analyzer Vent	VOC	0.01	0.01
EC4T0	Thermal Oxidizer (R-309)	VOC	0.14	0.63
		NOx	0.32	1.41
		СО	0.77	3.38
		SO <sub>2</sub>	0.01	0.01
		PM	0.80	3.48
		PM <sub>10</sub>	0.80	3.48
		PM <sub>2.5</sub>	0.80	3.48
EF1203	Regeneration Heater (KLP)	VOC	0.03	0.05
		NOx	0.15	0.24
		СО	0.22	0.36
		SO <sub>2</sub>	0.01	0.01
		PM	0.04	0.07
		PM <sub>10</sub>	0.04	0.07
		PM <sub>2.5</sub>	0.04	0.07
EF1202	Thermal Oxidizer (KLP)	VOC	0.57	0.93
		NOx	1.35	2.19

Project Number: 309264

#### Emission Sources - Maximum Allowable Emission Rates

<b>-</b> · · · <b>-</b> · · · · · · · · · · · · · · · · · · ·	0 N (0)	Air Contaminant Name	Emission Rates	
Emission Point No. (1)	Source Name (2)	(3)	lbs/hour	TPY (4)
		СО	3.21	5.20
		SO <sub>2</sub>	0.01	0.02
		PM	0.17	0.28
		PM <sub>10</sub>	0.17	0.28
		PM <sub>2.5</sub>	0.17	0.28
3E06	Regeneration Heater (F-302)	VOC	0.02	0.05
		NO <sub>x</sub>	0.63	1.36
		СО	0.38	0.82
		SO <sub>2</sub>	0.01	0.01
		PM	0.03	0.07
		PM <sub>10</sub>	0.03	0.07
		PM <sub>2.5</sub>	0.03	0.07
F3E00, F12E00,	Equipment Fugitives (East & West Train Service, East Plant Utility Service) (5)	VOC (6)	9.98	39.24
F8E00, F1E00, F16E00, F24E00, and F9E00	Service, East Plant Offility Service) (5)	Acetone	0.09	0.35
17E01	East Plant Flare (7)	VOC (6)	595.30	393.51
		Acetone	14.18	8.07
		NOx	66.81	51.06
		СО	299.99	249.79
		SO <sub>2</sub>	5.52	8.27
ENMSSROUT	Maintenance Emissions (8)	VOC	4.11	0.02

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

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

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

SO<sub>2</sub> - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented

PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as

represented

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

CO - carbon monoxide

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

Project Number: 309264

#### Emission Sources - Maximum Allowable Emission Rates

- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
  - The Fugitive Emissions EPNs and corresponding source names are as follows: EPNs F3E00 (Unit Fugitives East), F12E00 (C4 Recovery Areas), F8E00 (East Tank Farm), F1E00 (East Utilities Area), F16E00 (East Flare Area), F24E00 (Fuel Tanks Area), and F9E00 (Loading Rack Area).
- (6) The allowable emission rates listed for individual VOC species from this Emission Point No. (EPN) are included in the total VOC emission limits.
- (7) Flare emission limits include routine operations and Start-up, Shutdown, and Maintenance (MSS) emissions.
- (8) Attributable only to clean-out/maintenance of the reactors and their associated piping and equipment authorized in the permit amendment application of July 13, 2011.

Date: TBD	

Project Number: 309264



November 8, 2019

## Certified Mail #7015 0640 0002 0784 88446 EPERMITS 332771

Air Permits Review Division Air Permits Initial Review Team - MC 161 Texas Commission on Environmental Quality P.O. Box 13087 Austin, TX 78711-3087

Re: Equistar Chemicals, LP - Channelview Chemical Complex

TCEQ Air Quality Permits No. 2128 Permit Amendment Application Channelview, Texas Harris County

TCEQ Account ID No. HG-0033-B; RN100542281; CN600124705

Equistar Chemicals, LP (Equistar) operates the East Plant (EP) Flare under Texas Commission on Environmental Quality (TCEQ) Air Quality Permit No. 2128. . Equistar requests the amendment of this permit to update emissions from the Unit Flare.

A hard copy with the original signature of the NSR Workbook General sheet, as well, as, copies of the supporting documentation submitted through STEERS is included in this document. Required TCEQ Forms in the NSR Workbook and air dispersion modeling documentation in the EMEW Workbook have been submitted electronically. Relevant documents including emissions details, process description, flow diagrams, BACT and/or LAER analysis, area map, plot plan are included in this application submittal to assist in TCEQ's review. Equistar is requesting this application review be expedited and is sending the Surcharge Form under separate cover letter to the Cashier's Office. The amendment application fees are sent via wire transfer. If you have any questions regarding this application submittal, please contact Teresa Peneguy at (281) 452-8330.

Sincerely, June Warmen

Tom Warnement

Environmental Team Leader - Air

Enclosure

cc:

Harris County Pollution Control Services

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Certified Mail #7015 0640 0002 0784 8453

TCEQ Region 12

-submitted via STEERS 7015 0640 0002 0784 8668

U.S. EPA

R6AirPermitsTX@EPA.gov

## NEW SOURCE REVIEW PERMIT AMENDMENT APPLICATION

Permit No. 2128

**Submitted by:** 

Equistar Chemicals, L.P. - Channelview

TCEQ Account Number HG-0033-B

### **Submitted to:**

Texas Commission on Environmental Quality (TCEQ)
Air Permits Initial Review Team (APIRT)
Air Permits Division, MC-161
P.O. Box 13087
Austin, Texas 78711-3087

November 2019

## TABLE OF CONTENTS

SECTION	N 1 Introduction	1-1
1.1	Purpose	1-1
1.2	Permit History	
1.3	Facility Information	1-1
1.4	PSD and Non-attainment Review	1-2
1.5	Application Contents	1-3
SECTION	N 2 Process Description	2-1
2.1	Process Description	2-1
SECTION	N 3 Emission Calculation Methodology	3-1
3.1	Flare Emissions	3-1
	N 4 Best Available Control Technology and LOWEST ACHIEVABLE ISSION REDUCTION	
SECTION	N 5 Regulatory Applicability	5-1
5.1	General Application Requirements - §116.111	5-1
Figure 1-1	FIGURES Area Map	
C	OP2 Unit Process Flow Diagram	
LIST OF Appendix Appendix	APPENDICES  A Administrative Considerations and Application Forms  B Technical Application Tables  C Emission Calculations	

Equistar Chemicals, L.P. (Equistar) operates the East Plant Flare System under Texas Commission on Environmental Quality (TCEQ) Air Quality Permit No. 2128.

### 1.1 Purpose

Equistar requests the amend Air Quality Permit No. 2128, and is submitting this application as required under 30 TAC 116.111. Equistar is modifying the operation of the existing flare to meet future regulatory requirements. Additional natural gas is required to meet the anticipated operating limit to maintain a net heating value of the flare combustion zone gas (NHVcz) at or above 270 British thermal units per standard cubic feet (Btu/scf). The site anticipates future requirements for the combustion zone that match the limits currently identified in 40 CFR 63 Subpart CC. No changes to the operation of the process unit or process vent controlled by the flare are being made with this project. All increases of volatile organic compounds (VOC) emissions will result from the minimal non-methane and nonethane organics present in the imported natural gas supply. Additionally, the application identifies the sulfur dioxide (SO2) increases resulting from the minimal sulfur present in the natural gas. The combustion products oxides of nitrogen (NOx) and carbon monoxide (CO) that will be generated from the combustion of the additional natural gas are included in the emissions calculations.

The calculations and representations used in this permit amendment are based on best available estimates and should not be considered absolute values for all operating scenarios.

### **1.2** Permit History

Equistar currently operates the East Plant flare at their Channelview, Texas manufacturing complex under TCEQ Air Permit No. 2128.

The permit 2128 was initially issued in July 1995 for the C4 Recovery Unit. The permit was last renewed on May 9, 2016. The permit was amended April 10, 2018 to include alternative means of compliance for use of a future ground flare.

### 1.3 Facility Information

The project described in this application includes emissions related to the East Plant Flare System unit at the Equistar Channelview Facility. The regulated entity number for the facility is RN100542281. The Channelview Facility includes multiple process units; however, only the OP2 Unit is affected by this amendment. The Equistar Channelview Facility is located on Sheldon Road, Channelview, TX. All units operate under a single Federal Operating Permit, Permit No. O1426.

Figure 1.1 shows the location of the Channelview Facility on the Area Map. A detailed plot plan of the Facility showing the estimated locations of emissions units at the site is also provided in Figure 1.2.

### 1.4 PSD and Non-attainment Review

The Prevention of Significant Deterioration (PSD) regulations define a "major modification" as a physical change or a change in the method of operation of a major stationary source that would result in a significant emissions increase and a contemporaneous significant net emissions increase of any regulated pollutant. The project is not a major modification and is not subject to PSD or Non-attainment review for VOC, Carbon Monoxide CO, or Green House Gases (GHG). The project is a major modification for NOx and the associated Table 2F is included in Appendix A.

**Table 1-1 PSD and NNSR Review** 

Contaminants	Emissions Increases	PSD Applicability		PSD Applicability  Non- Attainment Applicability		
		Limit	Netting?	Limit	Netting?	
VOC	0.72	40	No	5	No	
SO2	3.37	40	No			
CO	46.44	100	No			
NOx	9.11	40	No	5	Yes	

### 1.5 Application Contents

Key components of this application are organized as follows:

- An area map and a plot plan are provided at the end of Section 1.
- > A process description and process flow diagram are included in Section 2.
- Emissions calculations methodologies are included in Section 3.
- ➤ Best Available Control Technology (BACT) and Lowest Achievable Emissions Limit (LAER) are addressed in Section 4.
- Regulatory applicability and compliance strategies are addressed in Section 5.
- Appendix A contains completed TCEQ administrative forms, PI-1 signature page from the NSR Workbook and the Expedited Permit Request Form APD-EXP
- > Appendix B contains TCEQ Table 2F Project Emissions Increases.
- > Appendix C contains emission rate calculations for all Emissions Points.

Figure 1-1 Area Map

Figure 1-1 Area Map Equistar Chemicals, L.P. - Channelview

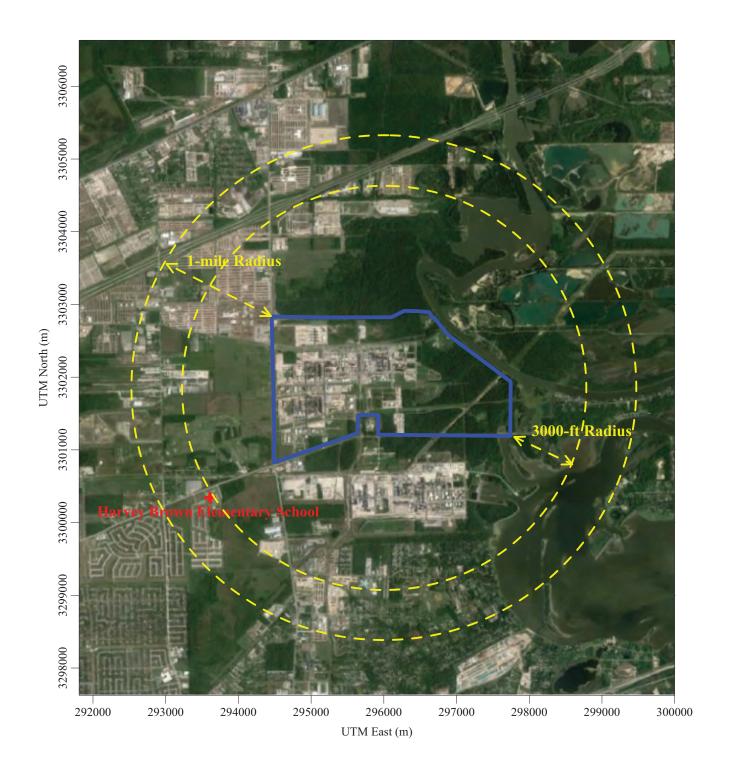
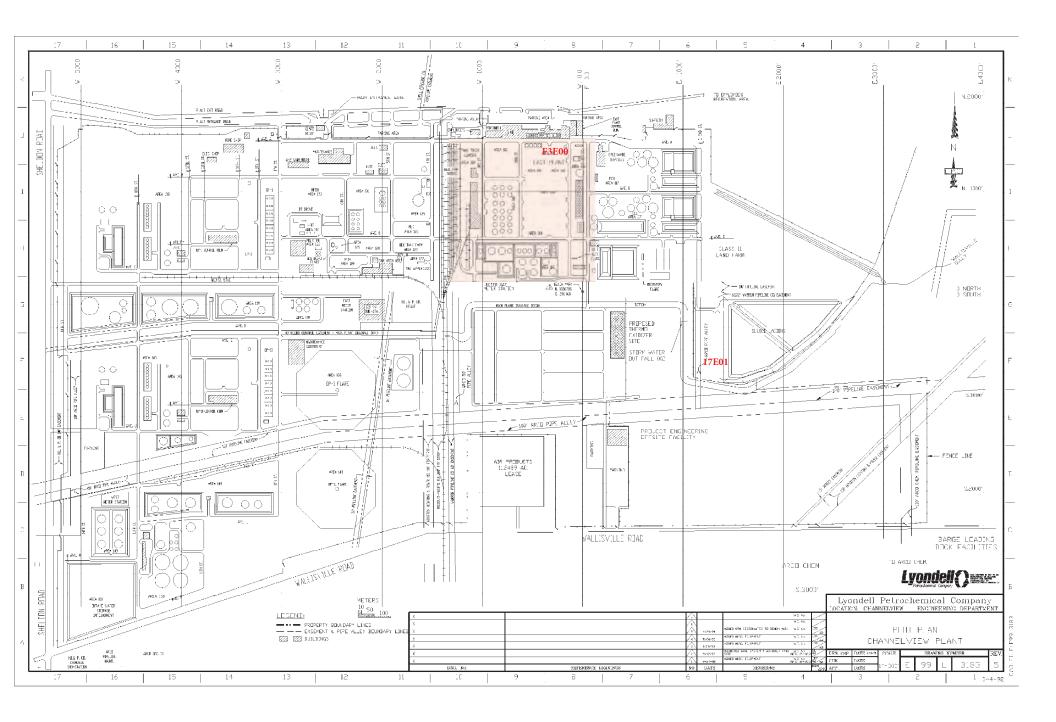
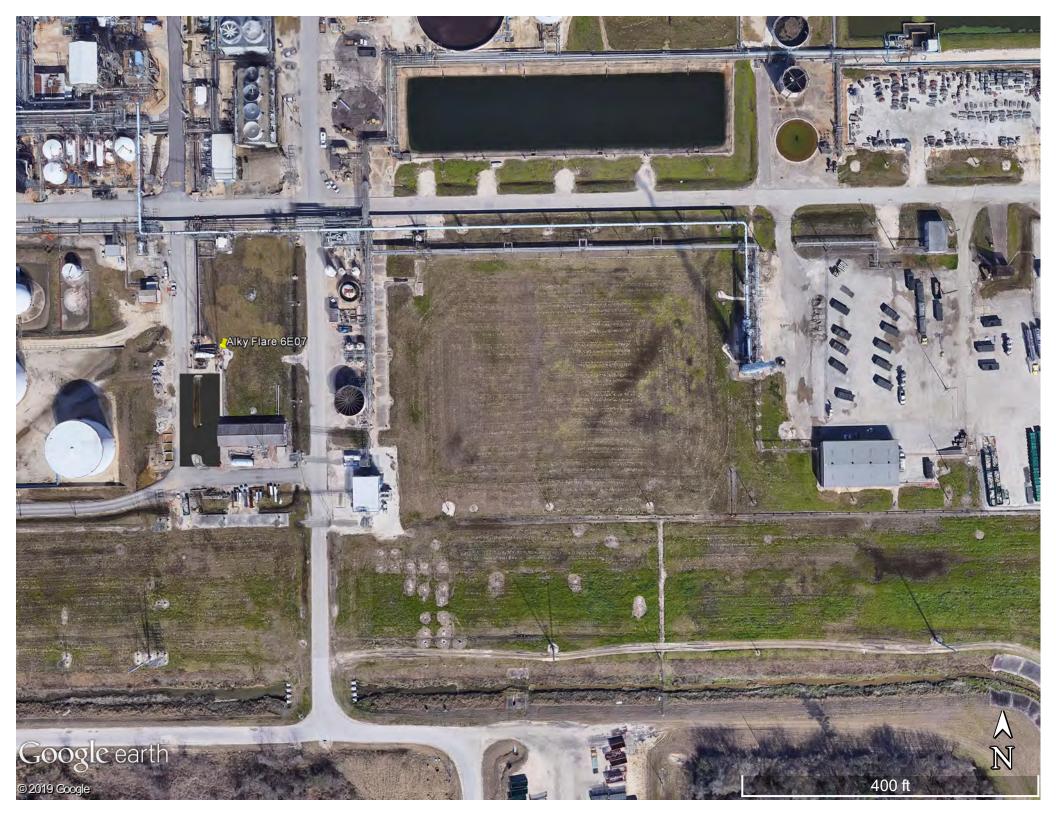


Figure 1-2 Plot Plan





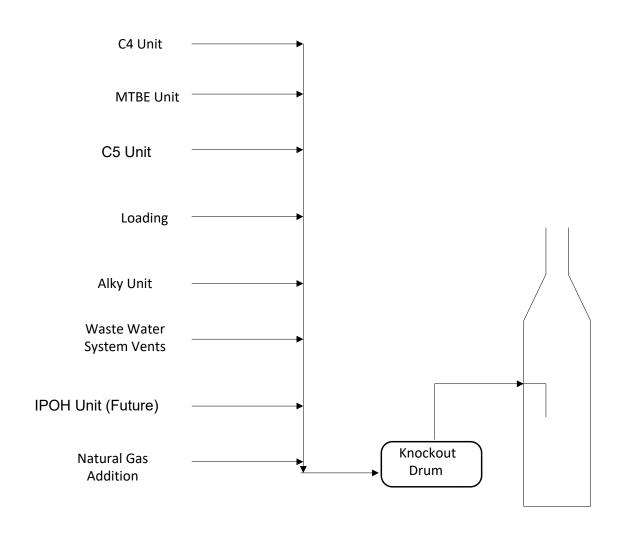
## SECTION 2 PROCESS DESCRIPTION

### 2.1 Process Description

The East Plant flare is included in this permit and is a shared control device for the C4 Butadiene recovery unit (TCEQ Air Permit No. 2128), MTBE unit (TCEQ Air Permit No. 6387), C5 Recovery Unit (TCEQ Air Permit No. 6245), and Alkylation Unit (TCEQ Air Permit No. 24887) as well as associated tank farm, loading facilities and vents from the Wastewater System. The flare processes vents associated with routine operation of each unit as well as maintenance, startup, shutdown, and emergency vents. The flare system consists of multiple flare headers and knockout drums. The headers converge into a single line and final knockout drum. A separate project to route the process vents from the Isopropanol (IPOH) Unit flare to the East Plant Flare was authorized under Standard Permit 157394.

## Figure 2-1 East Plant Process Flow Diagram

## Figure 2-1: Flare System Process Flow Diagram



## SECTION 3 EMISSION CALCULATION METHODOLOGY

This section describes the methodology used to calculate Potential-to-Emit (PTE) emissions from the sources affected by this project using BACT level controls. Emissions calculations are being provided electronically per TCEQ guidance.

### 3.1 Flare Emissions

The VOC emissions are estimated based on natural gas flow and the emission factor in EPA AP-42 for the combustion of natural gas. The flare is designed to ensure that the flares maintain compliance with NSR Permit No. 2128 and with applicable NSPS and State regulations when in use. NOx and CO emissions are estimated using emissions factors provided in TCEQ publication RG-360A/11, Appendix A: Technical Supplement, Table A-6, "Air Permit Flare Emissions Factors," revised February 2012. The unit operates a steam-assist flare to control vents from the process unit.

### 3.2 Fugitive Emissions

The TCEQ 28VHP fugitive emissions monitoring program is used to control fugitive emissions from the C4 Unit. The fugitive emissions from equipment included in the PBR being incorporated with this application have been estimated using the 28VHP program control efficiencies. Additionally, a control efficiency of 75% is used for connectors that are monitored annually, and a control efficiency of 97% is used for connectors that are monitored quarterly. The affected process unit contains streams various concentration of ethylene, therefore SOCMI without ethylene factors, SOCMI with ethylene factors, and SOCMI average ethylene factors were used in the fugitive emission estimation calculations. Emissions were calculated per the TCEQ "Technical Guidance Package for Chemical Sources: Equipment Leak Fugitives", issued October 2000.

### **SECTION 4**

## BEST AVAILABLE CONTROL TECHNOLOGY AND LOWEST ACHIEVABLE EMISSION REDUCTION

In accordance with 30 TAC Chapter 116, §116.111(a)(2)(C), any new or modified facility must utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the facility. Below is a BACT and LAER evaluation of the East Plant Flare and C4 Unit projects that were a modification per 30 TAC 101.

### 4.1 Flare

The flare meets at least 98% destruction efficiency (DRE) for organic compounds and 99% DRE for organic compounds with 3 carbon or less, which meets BACT. The emission factors for NOx and CO emissions from a steam-assisted flare were used and meet BACT for CO and LAER for NOx. The EPA RACT/BACT/LAER Clearinghouse identified LAER for NOx to be operating flare with good combustion practices in compliance with 40 CFR 60.18 and/or 40 CFR 63.11. The TCEQ published 0.068 lb/MMBtu NOx factor for low BTU steam-assisted flares was the lowest reported emission factor for an elevated flare during the last 10 years. A copy of the results of the Clearinghouse search is attached.

### 4.2 Fugitives

The unit complies with the 28VHP program for the fugitive components. 28VHP meets the requirements for BACT.

## SECTION 5 REGULATORY APPLICABILITY

Pursuant to TCEQ 30 TAC §116.111, Equistar will meet all rules and regulations of the TCEQ and the intent of the TCAA for the emission sources and activities addressed in this permit amendment application, as follows:

- ➤ §116.111(a)(1) A completed Form PI-1 has been signed by an authorized representative of Equistar and is included in Appendix A.
- $\geqslant$  §116.111(a)(2)(A) through (L) These items are addressed individually below.
- > §116.111(b) Equistar will comply with applicable 30 TAC 39 and 30 TAC 55 public notice and public participation requirements for this permit amendment application.

### 5.1 General Application Requirements - §116.111

The emissions associated with the proposed OP2 Unit project will comply with all applicable air quality rules and regulations and with the intent of the TCAA, including protection of the health and the physical property of people, as required by §116.111(a)(2)(A)(i). Following is a summary of rules and regulations as they apply to the proposed project:

<u>30 TAC 101 - General Rules</u>: The facility will be operated in accordance with the General Rules relating to circumvention, nuisance, traffic hazard, notification requirements for major upset, notification requirements for unplanned maintenance, sampling, sampling ports, emission inventory requirements, sampling procedures and terminology, compliance with Environmental Protection Agency (EPA) Standards, emissions fees, and all other applicable General Rules.

- <u>30 TAC 111 Visible Emissions and Particulate Matter</u>: Equistar will comply with all applicable requirements under this chapter.
- <u>30 TAC 112 Sulfur Compounds</u>: Equistar will comply with all applicable requirements under this chapter.
- <u>30 TAC 113 Toxic Materials</u>: TCEQ has incorporated MACT standards (40 CFR 63) into Chapter 113 by reference. The proposed facility will comply with all applicable provisions of Chapter 113 concerning control, recordkeeping, reporting, and monitoring requirements.
- <u>30 TAC 114 Motor Vehicles</u>: This provision of the rule controls the emissions from motor vehicles and does not apply to the facilities under consideration in this permit application.
- <u>30 TAC 115 Volatile Organic Compounds</u>: The proposed facility is located in Harris County and is regulated by the following Rules that are applicable to this permit application:

Subchapter B Division 2 – Vent Gas Control

Equistar will comply with all the applicable control, monitoring, testing, and recordkeeping requirements listed in this subchapter.

### <u>Subchapter D Division 3 - Fugitive Emission Control in Petrochemical Process in Ozone</u> Nonattainment Areas

Equistar will comply with all the applicable control, monitoring, inspection, and recordkeeping requirements listed in this subchapter

<u>30 TAC 116 - Permits for New Construction or Modification</u>: Equistar is complying with the requirements of Chapter 116 by submitting this permit application and as outlined below for each of the following sections:

### Rule 116.111(a)(2)(A) Protection of public health and welfare

As outlined below, the emissions from Equistar will comply with all air quality rules and regulations and with the intent of the TCAA, including protection of the health and physical property of the people.

### Rule 116.111(a)(2)(B) Measurement of Emissions

The proposed facility will have provisions for measuring the emission of significant air contaminants as determined by the Executive Director.

### Rule 116.111(a)(2)(C) Best Available Control Technology (BACT)

Section 4 of this application presents a discussion of BACT for the modified facilities associated with this application.

### Rule 116.111(a)(2)(D) Federal New Source Performance Standards (NSPS)

Equistar will comply with all applicable 40 CFR Part 60 controls, recordkeeping, reporting, and monitoring requirements.

### Rule 116.111(a)(2)(E) National Emission Standards for HAPs (NESHAP)

Equistar will comply with all applicable 40 CFR Part 61 controls, recordkeeping, reporting, and monitoring requirements.

### Rule 116.111(a)(2)(F) Maximum Achievable Control Technology (MACT)

Equistar will comply with all applicable 40 CFR Part 63 controls, recordkeeping, reporting, and monitoring requirements.

### Rule 116.111(a)(2)(G) Performance Demonstration

The proposed facilities are expected to perform as represented in this application.

### Rule 116.111(a)(2)(H) Nonattainment Review

The facility is located in a nonattainment area for VOC and NO<sub>x</sub>. See Section 1.4, PSD and Non-attainment Review, for details.

### Rule 116.111(a)(2)(I) Prevention of Significant Deterioration (PSD) review

The facility is located in an attainment area for SO2, PM10, CO, and lead.

See Section 1.4, PSD and Non-attainment Review, for details.

### Rule 116.111(a)(2)(J) Air Dispersion Modeling

Air dispersion modeling is being submitted with this application.

### Rule 116.111(a)(2)(K) Hazardous Air Pollutants

Equistar will comply with all applicable requirements under Subchapter E of this chapter.

### Rule 116. 111(a)(2)(L) Mass Cap and Trade Allowances

Equistar Channelview Facility is located in the Houston/Galveston/Brazoria area. Equistar has sufficient NOx allowances to demonstrate compliance with the mass emissions cap and trade program.

<u>30 TAC 117 - Nitrogen Compounds</u>: The provision of the rule does not apply to the proposed facilities considered in this permit application.

<u>30 TAC 118 - Air Pollution Episodes</u>: The facility will be operated in compliance with the rules relating to generalize a localized air pollution episode. An Emissions Reduction Plan is maintained as required by §118.5.

<u>30 TAC 122 - Federal Operating Permits:</u> The Channelview Facility operates under Federal Operating Permit No. O1426. The Title V Permit will be revised to reference the changes in applicable requirements resulting from the amendment to the NSR permit.

# APPENDIX A ADMINISTRATIVE CONSIDERATIONS AND APPLICATION FORMS

### **Permit Fee Calculation**

The amendment application fee is calculated according to 30 TAC §116.141(a), Determination of Fees, which specifies that the fee for an amendment is based on the capital cost of the project. The permit application fee is calculated and summarized on the TCEQ Table 30 included in the NSR Workbook.

The permit amendment fee of \$3,000 is provided with this application. The fee payment tracer number for the total amount including both fees is included in this appendix.

### **Compliance History**

Equistar is an existing site greater than 5-years old. Equistar requests that TCEQ compile the history of the site.

### **Administratively Application Forms**

The administrative information has been completed in the NSR Workbook and sent electronically to the Air Permit Initial Review Team. Additional the project EMEW for SCREEN workbook containing the modeling review information has been provided electronically.

Date: 10/01/2019
Permit #: 2128
Company: Equistar

I. Is a list of MSS activities attached?	
J. Is a discussion of state regulatory requirements attached, addressing 30 TAC Chapters 101, 111, 112, 113, 115, and 117?	Yes
For all applicable chapters, does the discussion include how the facility will comply with the requirements of the chapter?	Yes
For all not applicable chapters, does the discussion include why the chapter is not applicable?	Yes
K. Are all other required tables, calculations, and descriptions attached?	Yes

### VII. Signature

The owner or operator of the facility must apply for authority to construct. The appropriate company official (owner, plant manager, president, vice president, or environmental director) must sign all copies of the application. The applicant's consultant cannot sign the application. Important Note: Signatures must be original in ink, not reproduced by photocopy, fax, or other means, and must be received before any permit is issued.

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382; the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name:	Kim Foley
Signature:	Kin De
	Original signature is required.
Date:	11/12/19



## Basis2 Receipt Report by Endorsement Number

NOV-18-19 04:37 PM

Account Name: PERMIT AMENDMENT FEES (AIR) Acct. #: PAF Ref #2 Paid For Endors. # Paid In By PayTyp Chk # Card# Bank Slip Tran.Date Receipt Amnt. WRS0019805 2128 BS00076778 \$3000.00 C4 RECOVERY LYO EQUISTAR CHE WT WIRE 18-NOV-19

Report\_ID: Page 1

Date: 10/01/2019
Permit #: 2128
Company: Equistar

	I. Ap	plicant Information		
I acknowledge that I am sub	mitting an authorize	ed TCEQ application workbook	and any	
_	necessary attachments. Except for inputting the requested data and adjusting row height and			
	column width, I have not changed the TCEQ application workbook in any way, including but			
	not limited to changing formulas, formatting, content, or protections.			
A. Company Information	·	•		
Company or Legal Name:		Equistar Chemicals, LP		
Permits are issued to either th	e facility owner or on	erator, commonly referred to as th	ne annlicant or ne	ermit holder. List
		ership, or person who is applying for		
legal name with the Texas Sec			or the portine vve	wiii voiny tho
https://www.sos.state.tx.us	,			
Texas Secretary of State Char	ter/Registration			
Number (if given):	tom togiotration			
B. Company Official Contact	Information: must r	not be a consultant		
Prefix (Mr., Ms., Dr., etc.):	Mrs.	iot de decidentant		
First Name:	Kim			
Last Name:	Foley			
Title:	Site Manager			
Mailing Address:	PO Box 777			
Address Line 2:	T O BOX 1111			
City:	Channelview			
State:	Texas			
ZIP Code:	77530			
Telephone Number:	281-862-5150			
Fax Number:	201 002 0100			
Email Address:	kim.foley@lyb.c	om		
		ust have the authority to make bir	nding agreement	s and
	-	be a consultant. Additional tech		
provided in a cover letter.	. с аррисани ана нау			
Prefix (Mr., Ms., Dr., etc.):	Mrs.			
First Name:	Teresa			
Last Name:	Peneguy			
Title:	Environmental F	Permittina		
Company or Legal Name:	LyondellBasell			
Mailing Address:	PO Box 777			
Address Line 2:				
City:	Channelview			
State:	Texas			
ZIP Code:	77503			
Telephone Number:	281-452-8330			
Fax Number:				
Email Address:	teresa.peneguy	@lvb.com		
D. Assigned Numbers	i di da di pari agui	<u></u>		
_	signed when a Core [	Data Form is initially submitted to	the Central Regis	stry. The RN is
	•	stigation or if the agency has issue	•	•
		these questions blank and include		
application submittal. See Sec				•
Enter the CN. The CN is a uni	que number aiven to	each business, governmental		
body, association, individual, or other entity that owns, operates, is responsible for, 600124705				

Version 4.0 Page 1

or is affiliated with a regulated entity.

Date: 10/01/2019
Permit #: 2128
Company: Equistar

Enter the RN. The RN is a unique agency assigned number given to each person,
organization, place, or thing that is of environmental interest to us and where
regulated activities will occur. The RN replaces existing air account numbers. The
RN for portable units is assigned to the unit itself, and that same RN should be used
when applying for authorization at a different location.

100542281

### II. Delinquent Fees and Penalties

Does the applicant have unpaid delinquent fees and/or penalties owed to the TCEQ? This form will not be processed until all delinquent fees and/or penalties owed to 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. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at:

No

https://www.tceg.texas.gov/agency/financial/fees/delin

### **III. Permit Information**

### A. Permit and Action Type (multiple may be selected, leave no blanks)

Additional information regarding the different NSR authorizations can be found at: https://www.tceq.texas.gov/permitting/air/guidance/authorize.html

Select from the drop-down the type of action being requested for each permit type. If that permit type does not apply, you MUST select "Not applicable".

Provide all assigned permit numbers relevant for the project. Leave blank if the permit number has not yet been assigned.

Permit Type	Action Type Requested	Permit Number (if assigned)
remit type	(do not leave blank)	r erinit Number (ii assigned)
Minor NSR (can be a Title V major source): Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction	Amendment	2128
Special Permit: Not applicable, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction	Not applicable	
De Minimis: Not applicable, Initial	Not applicable	
Flexible: Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction	Not applicable	
PSD: Not applicable, Initial, Major Modification	Not applicable	
Nonattainment: <i>Not applicable, Initial, Major</i> <i>Modification</i>	Initial	
HAP Major Source [FCAA § 112(g)]: <i>Not</i> applicable, <i>Initial, Major Modification</i>	Not applicable	
PAL: Not applicable, Initial, Amendment, Renewal, Renewal/Amendment, Alteration	Not applicable	
GHG PSD: Not applicable, Initial, Major Modification, Voluntary Update	Not applicable	

Version 4.0 Page 2

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

B. MSS Activities			
How are/will MSS activities for sources associated with this project be authorized?	Combination (lis	t below)	
List the permit number, registration number, and/or PBR number.		83799, 106.263	
C. Consolidating NSR Permits			
Will this permit be consolidated into another NSR p	ermit with this ac	tion?	No
Will NSR permits be consolidated into this permit w	ith this action?		No
D. Incorporation of Standard Permits, Standard	Everntions on	d/or Dormito By Bulo (DBB)	
To ensure protectiveness, previously issued author		• • • • • • • • • • • • • • • • • • • •	or PRRs)
including those for MSS, are incorporated into a pe			
and/or amendment, consolidation (in some cases) i	may be voluntary	and referencing is mandatory. M	lore guidance
regarding incorporation can be found in 30 TAC § 1	16.116(d)(2), 30	TAC § 116.615(3) and in this me	emo:
https://www.tceq.texas.gov/assets/public/permitting		spc06.pdf	
Are there any standard permits, standard exemption be incorporated by reference?	ns, or PBRs to	No	
be incorporated by reference:			
Are there any PBR, standard exemptions, or standa	ard permits		
associated to be incorporated by consolidation? No	ote: Emission		
calculations, a BACT analysis, and an impacts anal		Yes	
attached to this application at the time of submittal authorization to be incorporated by consolidation.	for any		
· · · · · · · · · · · · · · · · · · ·		   143733, 144030, 137394, 14932	29. 17E00 ONIV
If yes, list any PBR, standard exemptions, or standanced to be consolidated:	ard permits that	for 150031 & 157735, only 25E0	•
If yes, are emission calculations, BACT analysis, ar	nd an impacts	153580	
analysis included for each authorization to be consc	•		
required information is not provided, the author	-	Yes	
incorporated by reference.			

Version 4.0 Page 3

E. Associated Federal Operating Permits

Date: 10/01/2019
Permit #: 2128
Company: Equistar

	General	Company: <u>Equi</u>		
Is this facility located at a site required to obtain a soperating permit (GOP)?	site operating permit (SOP) or general	Yes		
Is a <b>SOP</b> or <b>GOP</b> review pending for this source, an	rea. or site?	Yes		
If required to obtain a <b>SOP</b> or <b>GOP</b> , list all associated permit number(s). If no associated permit number has been assigned yet, enter "TBD":	O1426	,,,,,		
IV. Facility Loca	ation and General Information			
A. Location				
County: Enter the county where the facility is physically located.	Harris			
TCEQ Region	Region 12			
County attainment status as of Sept. 23, 2019	Serious Ozone nonattainment			
Street Address:	8280 Sheldon Road			
City: If the address is not located in a city, then enter the city or town closest to the facility, even if it is not in the same county as the facility.	Channelview			
ZIP Code: Include the ZIP Code of the physical facility site, not the ZIP Code of the applicant's mailing address.	77530			
Site Location Description: If there is no street address, provide written driving directions to the site. Identify the location by distance and direction from well-known landmarks such as major highway intersections.				
Use USGS maps, county maps prepared by the Te application such as Google Earth to find the latitude		oftware		
Latitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions. Latitude is the angular distance of a location north of the equator and will always be between 25 and 37 degrees north (N) in Texas.	029:49:56			
Longitude (in degrees, minutes, and nearest second (DDD:MM:SS)) for the street address or the destination point of the driving directions.  Longitude is the angular distance of a location west of the prime meridian and will always be between 93 and 107 degrees west (W) in Texas.	095:06:43			
Is this a project for a lead smelter, concrete crushing facility, and/or a hazardous waste management facility?				
B. General Information				
Site Name:	Channelview Facility			
Area Name: Must indicate the general type of operation, process, equipment or facility. Include numerical designations, if appropriate. Examples are Sulfuric Acid Plant and No. 5 Steam Boiler.	East Plant C4 Recovery Unit			
Vague names such as Chemical Plant are not				

Version 4.0 Page 4

acceptable.

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

Are there any schools located within 3,000 feet of the site boundary?		Yes		
C. Portable Facility				
Permanent or portable facility?		Permanent		
D. In december Trans				
D. Industry Type		SOCMI Chemicals		
Principal Company Product/Busine A list of SIC codes can be found at		SOCIVII CHEMICAIS		
https://www.naics.com/sic-codes-ir		J		
Principal SIC code:	idusti y-di ilidowii	<u>//</u>   2869		
NAICS codes and conversions bet	Ween NAICS and			
https://www.census.gov/eos/www/r		d Old Codes are available at.		
Principal NAICS code:	<u>Idio3/</u>	325199		
E. State Senator and Representa	tive for this site			
		is not compatible to Internet Explorer):		
https://wrm.capitol.texas.gov/		in the semi-substitution of Explorery.		
State Senator:		John Whitmire		
District:		15		
State Representative:		Ana Hernandez		
District:		143		
	V. F	Project Information		
A. Description				
Provide a brief description of the				
project that is requested. (Limited	Natural gas is b	eing added to flare to meet furture regulatory fl	ame zone heat	
to 500 characters).	value requireme		aille Zolle lleat	
	value requireme	sine for fideoc.		
B. Project Timing				
		pefore beginning construction. Construction is b		
as anything other than site clearan	ce or site prepar	ration. Enter the date as "Month Date, Year" (e.	g. July 4, 1776).	
	TDD			
Projected Start of Construction:	TBD			
Projected Start of Operation:	TBD			
C. Enforcement Projects	r rolated to an a	agonay investigation, nation of violation, or		
enforcement action?	i relateu to, an a	agency investigation, notice of violation, or	No	
emoreement action:				
D. Operating Schedule				
Will sources in this project be authorized	orized to operate	e 8760 hours per vear?	Yes	
		1 00		

## VI. Application Materials

All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. (30 TAC § 116.116)

### A. Confidential Application Materials

Version 4.0 Page 5

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

Is confidential information submitted with this application?	No
B. Is the Core Data Form (Form 10400) attached?	No
https://www.tceq.texas.gov/assets/public/permitting/centralregistry/10400.docx	140
C. Is a current area map attached?	Yes
Is the area map a current map with a true north arrow, an accurate scale, the entire plant property,	
the location of the property relative to prominent geographical features including, but not limited to,	Yes
highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, hospitals, day care centers, and churches?	103
Does the map show a 3,000-foot radius from the property boundary?	Yes
D. Is a plot plan attached?	Yes
Does your plot plan clearly show a north arrow, an accurate scale, all property lines, all emission	
points, buildings, tanks, process vessels, other process equipment, and two bench mark locations?	Yes
Does your plot plan identify all emission points on the affected property, including all emission points	
authorized by other air authorizations, construction permits, PBRs, special permits, and standard permits?	Yes
Did you include a table of emission points indicating the authorization type and authorization	
identifier, such as a permit number, registration number, or rule citation under which each emission point is currently authorized?	Yes
E. Is a process flow diagram attached?	Yes
Is the process flow diagram sufficiently descriptive so the permit reviewer can determine the raw	
materials to be used in the process; all major processing steps and major equipment items;	
individual emission points associated with each process step; the location and identification of all	Yes
emission abatement devices; and the location and identification of all waste streams (including wastewater streams that may have associated air emissions)?	
F. Is a process description attached?	Yes
Does the process description emphasize where the emissions are generated, why the emissions	
must be generated, what air pollution controls are used (including process design features that	Yes
minimize emissions), and where the emissions enter the atmosphere?	
Does the process description also explain how the facility or facilities will be operating when the	Yes
maximum possible emissions are produced?	163
G. Are detailed calculations attached? Calculations must be provided for each source with	
new or changing emission rates. For example, a new source, changing emission factors, decreasing emissions, consolidated sources, etc. You do not need to submit calculations for	
sources which are not changing emission rates with this project. Please note: the preferred	Yes
format is an electronic workbook (such as Excel) with all formulas viewable for review. It can	
be emailed with the submittal of this application workbook.	
Are emission rates and associated calculations for planned MSS facilities and related activities	Yes
attached?	
H. Is a material balance (Table 2, Form 10155) attached?	Yes

Version 4.0 Page 6

## Form APD-EXP Expedited Permitting Request

I. Contact Information	
Company or Other Legal Customer Name: Equistar Chemicals, LP	
Customer Reference Number (CN): 600124705	
Regulated Entity Number (RN): 100542281	
Company Official or Technical Contact Name: Teresa Peneguy	
Phone Number: 281-452-8330	
Email: teresa.peneguy@lyb.com	
II. Project Information	
Facility Type: Channelview Facility, C4 Unit	
Permit Number: 2128	
Project Number: TBD	
III. Economic Justification	
The purpose of the application associated with this request to expedite will benefit the economy of this state or an area of this state.	ĭ YES ☐ NO
IV. Delinquent Fees and Penalties	
Applications will not be expedited if any delinquent fees and/or penalties are owed to the T of the Attorney General on behalf of the TCEQ. For more information regarding Delinquen Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/delin/index.html.	'CEQ or the Office t Fees and
V. Signature	
The signature below confirms that I have knowledge of the facts included in this application facts are true and correct to the best of my knowledge and belief. As the applicant, I commi expectations of the expedited permitting program and application requirements promptly. expectation or requirement may cause my application to be removed from the expedited per and possibly voided at the discretion of the TCEQ Executive Director. The signature further awareness that intentionally or knowingly making or causing to be made false material stat representations in the application is a criminal offense subject to criminal penalties.	t to fulfilling all Failure to meet any ermitting program r signifies
Name: Teresa Peneguy	
Signature: Leesa Paregery	
Date: 11/8/2019	

**Reset Form** 



## Basis2 Receipt Report by Endorsement Number

NOV-18-19 04:36 PM

Acct. #: APS Account Name: AIR PERMIT EXPEDITED FEE

Paid For Endors. # Ref #2 Paid In By PayTyp Chk # Card# Bank Slip Tran.Date Receipt Amnt. 2128/C4 RECOVERY WRS0019798 WIRE BS00076778 \$20000.00 LYO EQUISTAR CHE WT 18-NOV-19

Report\_ID: Page 1

# APPENDIX B TECHNICAL APPLICATION TABLES

## **Technical Application Tables**

The following table is included in this appendix:

Table 2F – Project Increases

## TABLE 2F PROJECT EMISSION INCREASE

Pollutant <sup>1</sup> :	Nox		Permit:	2128
Baseline Period:	N/A new stream	to	•	

	Affected or Modi	fied Facilities <sup>2</sup>	Permit No.	Actual Emissions <sup>3</sup>	Baseline	Proposed	Project Actual	Difference (B-	67	Project
	FIN	EPN	Permit No.	Actual Emissions	Emissions <sup>4</sup>	Emissions <sup>5</sup>	Emissions	A) <sup>6</sup>	Correction <sup>7</sup>	Increase <sup>8</sup>
1.	17E01	17E01	2128	0	0	9.11	9.11	9.11		9.11
2.										
3.										
4.										
5.										
6.										
7.										
8.										
9.										
	Page Subtotal <sup>9</sup>								9.11	

<sup>&</sup>lt;sup>1</sup> Individual Table 2F=s should be used to summarize the project emission increase for each criteria pollutant

Correct actual emissions for currently applicable rule or permit requirements, and periods of non-compliance. These corrections, as well as any MSS previously

Correction made to emission increase for what portion could have been accommodated during the baseline period. The justification and basis for this estimate must be

<sup>&</sup>lt;sup>2</sup> Emission Point Number as designated in NSR Permit or Emissions Inventory

<sup>&</sup>lt;sup>3</sup> All records and calculations for these values must be available upon request

<sup>&</sup>lt;sup>4</sup> demonstrated under 30 TAC 101, should be explained in the Table 2F supplement

<sup>&</sup>lt;sup>5</sup> If projected actual emission is used it must be noted in the next column and the basis for the projection identified in the Table 2F supplement

<sup>&</sup>lt;sup>6</sup> Proposed Emissions (column B) minus Baseline Emissions (column A)

<sup>&</sup>lt;sup>7</sup> provided in the Table 2F supplement

<sup>&</sup>lt;sup>8</sup> Obtained by subtracting the correction from the difference. Must be a positive number.

<sup>&</sup>lt;sup>9</sup> Sum all values for this page.

## APPENDIX C EMISSION CALCULATIONS

Included in this appendix is the emissions calculations for the additional natural gas to the flare. The flare and fugitive emissions calculations associated with the PBRs and Standard Permits being incorporated with this permit amendment are also included. included.

**Emission Factors** 

NOx 0.068 lb/MMBtu TCEQ EI Guidance for Steam-assist flare CO 0.3465 lb/MMBtu TCEQ EI Guidance for Steam-assist flare

SO2 5 gr/100 dscf vendor spec

VOC 5.5 lb/MMscf AP-42 Natural Gas Combustion

1020 Btu/scf

EPN: 17E01

**Additional Natural Gas** 

Avg Natural Gas 30,000 scfh Max Natural Gas 72,000 scfh

Max Hourly	Current Auth	Nat Gas Increase	Total
	lb/hr	lb/hr	lb/hr
NOx	61.82	4.99	67.11
СО	274.54	25.45	301.49
SO2	-	1.03	-
VOC	594.90	0.40	599.87

Annual	Current Auth	Nat Gas Increase	Total
	tpy tpy		tpy
NOx	41.95	9.11	51.43
СО	203.35	46.44	251.53
SO2	-	1.88	-
VOC	392.79	0.72	398.85

### Sample Calculation

Hourly NOx

72,000 scf	1020 Btu	MMBtu	0.068 lb	=	4.99 lb NO
hr	scf	10^6 Btu	MMBtu		hr

Annual SO2

30,000 scf	MMscf	5 gr	lb S	2 lb SO2	8760 hr	ton	_ =	1.88 ton SO2
hr	10^6 scf	100 dscf	7000 gr	lb S	yr	2000 lb	_	hr

### SO2 existing flows convert to 5 S grain/ 100 dscf basis

current auth	5 gr	lb S	2 lb SO2	10^6 scf
0.6 lb SO2/MMscf	100 dscf	7000 gr	lb S	MMscf

			Current	Current		
Unit	Permit before SP	Factor current	lb/hr	tpy	Revised lb/hr	Revised tpy
C4 Recovery Nat Gas	2128	0.6 lb/MMscf	0.05	0.05	1.08	1.08
Alky Nat Gas	24887	5 gr/100 dscf	1.08	0.26	1.08	0.26
IPOH Nat Gas	49130	0.6 lb/MMscf	0.01	0.02	0.24	0.48
Alky Process	24887	historical S content	2.09	4.57	2.09	4.57
Add Nat Gas		5 gr/100 dscf			1.03	1.88
			3.22	4.89	5.52	8.26

Alky Process vent with S (no change in representation or calculation methodology)

Process flow to flare 7,450 lb/hr

32,631,000 lb/yr 140 ppmw

 S content
 140 ppmv

 SO2 lb / S lb
 2

 SO2 lb/hr
 2.09 lb/hr

 SO2 tpy
 4.57 tpy

	lb/hr	tpy
Current Auth	3.23	4.90
Increase	2.29	3.37
Proposed Allowable	5.52	8.26

Authorization	Project Area			lb/hr					tpy		
		VOC	Acetone	Nox	SO2	со	VOC	Acetone	Nox	SO2	со
2128	Effective Permit	478.41	0.27	46.69	0.05	197.41	255.46	1.13	28.85	0.05	136.64
143753	Alky process vent to EP Std Permit	549.75	0.27	56.35	3.22	246.66	340.43	1.13	36.22	4.88	174.18
	Standard Permit Auth.	638.57	11.18	68.22	39.74	307.19	419.74	8.18	48.38	37.34	235.98
	IPOH Flare (IPOH vent 49130)	41.63	10.12	4.42	0.01	22.52	50.80	6.29	5.42	0.02	27.62
157394	IPOH Flare (SMA vent 24677)	4.57	0.04	0.29		1.50	5.34	0.05	0.37		1.74
	Poly BD	42.62	0.75	7.16	36.51	36.51	23.17	0.71	6.37	32.44	32.44
	To be incorporated	591.38	10.39	60.77	3.23	269.18	391.23	7.42	41.64	4.90	201.80
107709	IPOH vent	1.01	3.61	0.89		4.53	0.16	0.57	0.22		1.10
153580	IPOH vent	2.39	0.18	0.15		0.79	1.15	0.08	0.07		0.37
150031	Alky vent	0.06		0.01		0.02	0.24		0.02		0.08
157735	Alky vent	0.06		0.00		0.02	0.01		0.00		0.00
	to be consolidated	116.49	13.91	15.13	3.18	77.13	137.33	6.94	13.10	4.85	66.71
	Total Allowable	594.90	14.18	61.82	3.23	274.54	392.79	8.07	41.95	4.90	203.35
	PBR only	3.52	3.79	1.05	0.00						
	Alky only	71.34				49.25	84.97	0.00			
	IPOH only	41.63		4.42	0.01	22.52	50.80				
	Flare Project	0.40		4.99	2.29	25.45	0.72		9.11	3.37	46.44
	Proposed Allowable	595.30	14.18	66.81	5.52	299.99	393.51	8.07	51.06	8.27	249.79

adjust allowable since PolyBD flare vent will not be moved and SMA unit shutdown

#### Comments:

IPOH process vent has 2 operating scenarios - with and without the reactor operating
For modeling the speciated chemicals were evaluated based on highest concentration for each operating case
However total VOC added to MAERT based on Operating Scenario 1 and not sum of speciated chemicals

 Ib/hr
 tpy

 Operating Scena
 41.63
 50.8

 Operating Scena
 30.94
 34.19

		lb/hr	tpy
Total VOC	wt%	0.14	0.60
1,3-BUTADIENE	75%	0.10	0.45
I-BUTANE	100%	0.14	0.60
N-BUTANE	100%	0.14	0.60
BUTENE-1	100%	0.14	0.60
ISOBUTYLENE	100%	0.14	0.60
T-BUTENE-2	100%	0.14	0.60
C-BUTENE-2	100%	0.14	0.60
1,2-BUTADIENE	100%	0.14	0.60

Component Class	Chemical State	_	28VHP Control Efficiency <sup>2</sup>	Count	Emissions Estimate (lb/hr)	Emissions Estimate (tpy)
Flange / Connector	Gas / Vapor	0.0029	97%	138	0.01	0.05
Flange / Connector	Light Liquid	0.0005	97%	751	0.01	0.05
Other1 Component	Gas / Vapor	0.0029	75%	55	0.04	0.17
Other1 Component	Light Liquid	0.0005	75%	301	0.04	0.16
Pumps	Light Liquid	0.0386	100%	5	0.00	0.00
Relief Valves	Gas / Vapor	0.2293	100%	9	0.00	0.00
Relief Valves	Light Liquid	0.0007	100%	5	0.00	0.00
Other2 Components	Gas / Vapor	0.0058	75%	0	0.00	0.00
Other2 Components	Light Liquid	0.001	75%	5	0.00	0.01
Other3 Components	Light Liquid	0.0005	75%	9	0.00	0.00
Valves	Gas / Vapor	0.0089	97%	55	0.01	0.06
Valves	Light Liquid	0.0007	97%	301	0.01	0.03
	•	Total Com	ponent Cou	1634		
		Total VOC	Emissions		0.12	0.54

Fugitives in <10% VOC Service

Component Class	Chemical State	SOCMI without C <sub>2</sub> Factor <sup>1</sup>	28VHP Control Efficiency	Count	Emissions Estimate (lb/hr)	Emissions Estimate (tpy)
Valves	Light Liquid	0.0007	30%	40	0.02	0.09
Flange / Connector	Light Liquid	0.0005	30%	100	0.04	0.15
Other1 Component	Light Liquid	0.0005	30%	40	0.01	0.06
Pumps	Light Liquid	0.0386	30%	2	0.05	0.24
Other2 Components	Light Liquid	0.001	30%	0	0.00	0.00
		Total Component Cou Total Emissions		182		
					0.12	0.54
		Total VOC	Emissions		0.01	0.05

## APPENDIX D PBR AND STANDARD PERMIT APPROVAL LETTER

Included in this appendix is the TCEQ approval letters for the following Permit By Rules (PBR):

- > PBR Authorization No. 107709 for increase in vent to flare from IPOH Unit;
- ▶ PBR Authorization No. 153580 for increase in vent to flare from IPOH Unit;
- ➤ PBR Authorization No. 150031 for increase in vent to flare from Alky Unit;
- ➤ PBR Authorization No. 157735 for increase in vent to flare from Alky Unit;
- ➤ PBR Authorization No. 149329 for fugitive components;
- ➤ PBR Authorization No. 155486 for fugitive components.

Included in this appendix is the TCEQ approval letter for the following Standard Permit (SP):

- > Standard Permit Authorization No. 143753 for moving Alky vents to EP Flare;
- > Standard Permit Authorization No. 157394 for moving IPOH vents to EP Flare;
- > Standard Permit Authorization No. 144030 for replacement of the EP Flare tip.

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





CVO ENVIRONMENTAL

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 12, 2013

MS COURTNEY RUTH SITE MANAGER EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Permit by Rule Registration Number:

Location/City/County: Project Description/Unit:

107709 8280 Sheldon Rd Bldg. 1, Channelview, Harris County Revision of the emissions from the reactor system and

collateral emissions from affected units / Isopropanol

Unit

Regulated Entity Number: Customer Reference Number: RN100542281 CN600124705

New or Existing Site: Affected Permit (if applicable): Existing 49130

Renewal Date (if applicable):

None

Equistar Chemicals, LP has certified the revised emissions associated with the addition of a reactor system and collateral emissions from affected units in the Isopropanol Unit at the Channelview Complex under Title 30 Texas Administrative Code §§ 106.261 and 106.262. Emissions should be incorporated into Permit Number 49130 at next amendment or renewal. For rule information see:

www.tceq.texas.gov/permitting/air/nav/numerical\_index.html

Planned MSS emissions (EPN ENMSSROUT) for clearing the reactor and ancillary equipment have been reviewed. These authorized MSS emissions are included on the emissions table. No other planned MSS emissions will be authorized under this registration. The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

This certification is taken under the authority delegated by the Executive Director of the TCEQ. If you have questions, please contact Ms. Nancy Akintan at (713) 767-3773.

Sincerely.

Anne M. Inman, P.E., Manager Rule Registrations Section

Air Permits Division

cc: Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Number: 194582

# Emission Sources - Certified Emission Rates

## Registration Number 107709

This table lists the certified emission rates and all sources of air contaminants on the applicant's property covered by this registration. The emission rates shown are those derived from information submitted as part of the registration for PBR.

ESTIMATED EMISSIONS	五二日 子信奉														
EPN / Emission Source	Specific	VOC	ာ	NOX		00	10	PM <sub>10</sub>	0	PM 2.5	ľ	SO <sub>2</sub>		Other	er.
	VOC	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr tpy lbs/hr tpy lbs/hr tpy lbs/hr tpy lbs/hr tpy lbs/hr tpy	yq.	bs/hr	tpy
F26E00/IPOH Unit Fugitives	Acetone	0.01	90.0											0.05	0.20
31E05/Tank TK-3105	Acetone	ı	0.45										T	0.39	0.28
31E06/Tank TK-3106		ı	0.11												
31E07/Tank TK-3107		ı	0.11						Γ				<del> </del>		
31E08/Tank TK-3108		0.07	0.15										<del>                                     </del>		
31E09/Tank TK-3109		0.03	0.08												
31E10/Tank TK-3110	Acetone	0.03											T	0.12	0.18
ETK3123/Tank TK-3123		1	0.07						T				<del> </del>		
ETK3124/Tank TK-3124		,	0.21										-		
25EO1/IPOH Flare-FL-2501	Acetone	1.01	0.16	0.89	0.22	4.53	1.10						$\dagger$	3.61	0.57
ENMSSROUT/MSS	Acetone	0.02	<0.01											80.0	<0.01
26PVSP2643/IPOH Vapor Recovery Skid		ı	0.14												
TOTAL EMISSIONS (TPY):	IONS (TPY):	-	1.54	-	0.22		1.10							,	1.34
MAXIMUM OPERATING SCHEDULE:	GSCHEDUL		Hours/Day	ıy	Da	Days/Week	ek	調	Week	Weeks/Year		Hor	urs/	Hours/Year	8760

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Toby Baker, *Executive Director* 



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 29, 2018

MRS TERESA PENEGUY SITE MANAGER EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Permit by Rule Registration Number:

153580

Equistar Chemicals, LP Isopropanol Unit (IPOH) Channelview, Harris County

Regulated Entity Number: RN100542281
Customer Reference Number: CN600124705

Affected Permit: 49130

This is in response to your certification Form PI-7 CERT regarding the change in feed quality and volume to the Isopropanol Unit (IPOH) at the Equistar Chemicals Channelview Complex located at 8280 Sheldon Rd, Channelview, Harris County.

Equistar Chemicals, LP has certified the emissions under Title 30 Texas Administrative Code (TAC) §§ 106.261 and 106.262. For rule information see:

www.tceg.texas.gov/permitting/air/nav/numerical index.html

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 49130 when it is amended or renewed. The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

If you need further information or have questions, please contact Ms. Nancy Akintan at (713) 767-3773 or write to the Texas Commission on Environmental Quality (TCEQ), Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

Mark Meyer, Manager Rule Registrations Section

Mark T. Meyer

Air Permits Division

cc: Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Number: 290841

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



#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 1, 2018

MRS TERESA PENEGUY ENVIRONMENTAL PERMITTING EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Permit by Rule Registration Number: 150031

Equistar Chemicals, LP

**Equistar Chemicals Channelview Complex** 

Channelview, Harris County

Regulated Entity Number: RN100542281
Customer Reference Number: CN600124705
Affected Permit: 2128 and 24887

This is in response to your certification Form PI-7 CERT regarding the addition of analyzers a the Alkylation Unit at the Equistar Chemicals Channelview Complex located at 8280 Sheldon Rd, Channelview, Harris County. Equistar Chemicals, LP has certified the emissions under Title 30 Texas Administrative Code (TAC) § 106.261 and 106.262. For rule information see: www.tceq.texas.gov/permitting/air/nav/numerical\_index.html

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into NSR Permit Nos. 2128 and 24887 when next amended or renewed. The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

If you need further information or have questions, please contact Mr. James Nolan at (512) 239-6634 or write to the Texas Commission on Environmental Quality (TCEQ), Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

Samuel Short, Manager Rule Registrations Section

Air Permits Division

cc: Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Number: 280189

# Emission Sources - Certified Emission Rates

## Registration Number 150031

This table lists the certified emission rates and all sources of air contaminants on the applicant's property covered by this registration. The emission rates shown are those derived from information submitted as part of the registration for PBR.

<b>ESTIMATED EMISSIONS</b>	ISSIONS												
Ш	EPN / Emission Source	VOC	O	NOX	×	00		Ь	PM <sub>10</sub>	SO <sub>2</sub>	2		
		lbs/hr	tpy	tpy   lbs/hr   tpy   lbs/hr   tpy   lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr   tpy   lbs/hr	tpy
17E01	East Plant Flare (Increases)	0.06	0.24	0.24 0.01 0.02	0.02	0.02 0.08	0.08						
F4E00	Alky Process Fugitives (Increases)	<0.01	0.02										
TO.	TOTAL EMISSIONS (TPY):		0.26		0.02		0.08						
MAXIMU	MAXIMUM OPERATING SCHEDULE:	Hours/Day	/Day		Days/	Days/Week		Week	Weeks/Year		Hour	Hours/Year 8,760	8,760

Jon Niermann, Chairman Emily Lindley, Commissioner Toby Baker, Executive Director



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 21, 2019

Mr. Tom Warnement Environmental Manager - Air Equistar Chemicals, LP PO BOX 777 Channelview, TX 77530

Permit by Rule Registration Number: 157735

Equistar Chemicals, LP

Project Description/Unit: Equistar Chemicals Channelview Complex

City: Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

30 TAC § 106.261 30 TAC § 106.262

Affected Permit(s): 2128,24887

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

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 2128,24887 when it is amended or renewed.

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

This action is taken under authority delegated by the Executive Director of the TCEQ. If you need further information or have questions, please contact the Rule Registrations Section at (512) 239-1250 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Page 2 Permit No. 157735

Sincerely,

Mark Meyer, Manager

Mark T. Meyer

Rule Registrations Section Air Permits Division Texas Commission on Environmental Quality

[Project Number: 304301]

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



#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 18, 2018

MS KIM FOLEY SITE MANAGER EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Permit by Rule Registration Number: 149329

Equistar Chemicals, LP New Fugitive Components Channelview, Harris County Regulated Entity Number:

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

Affected Permit: 2128

This is in response to your certification Form PI-7 CERT regarding the New Fugitive Components located at 8280 Sheldon Rd, Channelview, Harris County.

Equistar Chemicals, LP has certified the emissions under Title 30 Texas Administrative Code (TAC) §§ 106.261 and 106.262. For rule information see:

www.tceq.texas.gov/permitting/air/nav/numerical\_index.html

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 2128 when it is amended or renewed.

The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

If you need further information or have questions, please contact Mr. Jonathan Wilmoth, P.E. at (512) 239-0567 or write to the Texas Commission on Environmental Quality (TCEQ), Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

Samuel Short, Manager Rule Registrations Section Air Permits Division

cc: Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Number: 277983

#### **Emission Sources - Certified Emission Rates**

#### Registration Number 149329

This table lists the certified emission rates and all sources of air contaminants on the applicant's property covered by this registration. The emission rates shown are those derived from information submitted as part of the registration for PBR.

ESTIMATED EMISSIONS														
EPN / Emission Source	VO	С	NOx		CO		PM <sub>1</sub>	0	1, 3-Buta	diene	Buter	ies	Beta-B	utylene
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
F3E00, F12E00, F8E00, F1E00, F16E00, F24E00, F9E00	0.11	0.48							0.08	0.36	0.11	0.48	0.11	0.48
/ Unit Equipment Fugitives (East and West Train Service,													1	
and East Plant Utility Areas)													1	
TOTAL EMISSIONS (TPY):		0.48								0.36		0.48	1	0.48
MAXIMUM OPERATING SCHEDULE:		Hours/Da	У		Days/\	Neek		1	Weeks/Year			Hour	s/Year	8,760

Jon Niermann, Chairman Emily Lindley, Commissioner Toby Baker, Executive Director



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 14, 2019

Mr. Thomas Warnement Environmental Permitting Equistar Chemicals, LP PO BOX 777 Channelview, TX 77530

Permit by Rule Registration Number: 155486

Equistar Chemicals, LP

Project Description/Unit: Equistar Chemicals Channelview Complex

City: Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

30 TAC § 106.261 30 TAC § 106.262

Affected Permit(s): 2128

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

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 2128 when it is amended or renewed.

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

This action is taken under authority delegated by the Executive Director of the TCEQ. If you need further information or have questions, please contact the Rule Registrations Section at (512) 239-1250 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Page 2 Permit No. 155486

Sincerely,

Mark Meyer, Manager

Mark T. Meyer

Rule Registrations Section Air Permits Division Texas Commission on Environmental Quality

[Project Number: 296191]

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



#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 19, 2016

MR TODD MONETTE SITE MANAGER EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Re: Pollution Control Projects Air Quality Standard Permit

(Effective 2/9/2011)

Standard Permit Registration Number: 143753

Standard Permit Expiration Date: December 14, 2026

Equistar Chemicals, LP

Equistar Chemicals Channelview Complex

Affected Permit: 2128 and 24887

Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

Account Number: HG-0033-B

#### Dear Mr. Monette:

This is in response to your Form PI-1S (Air Quality Standard Permit for Pollution Control Projects) regarding the proposed construction to be located at 8280 Sheldon Rd., Channelview, Harris County. We understand that this registration is for emissions associated with the Alky Flare (Emission Point Number [EPN] 6E07 [Permit Number 24887]) being transferred to the East Plant Flare (EPN 17E01, Permit Number 2128). We also understand that the Alky Flare will be taken out of service permanently.

After evaluation of the information you submitted, the Texas Commission on Environmental Quality (TCEQ) has determined that your proposed emissions are authorized by this standard permit pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602) if constructed and operated as represented in your registration. This standard permit was issued under the Texas Clean Air Act (TCAA) § 382.011, which authorizes the commission to control the quality of the state's air; TCAA § 381.023, which authorizes the commission to issue orders necessary to carry out the policy and purposes of the TCAA; and § 382.05195, which authorizes the commission to issue standard permits. Authorized emissions are listed on the attached table.

You must begin construction or modification of these facilities in accordance with this standard permit no later than 18 months after the date of this letter. After completion of construction or modification, the appropriate TCEQ Regional Office must be notified prior to commencing operation and the facility shall be operated in compliance with all applicable conditions of the claimed standard permit.

Mr. Todd Monette Page 2 December 19, 2016

Re: Standard Permit Registration Number 143753

You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit be administratively incorporated into the affected facilities' permit(s) at the next amendment or renewal.

You are also reminded that these facilities must be in compliance with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

If you need further information or have any questions, please contact Mr. Marc Sturdivant at (512) 239-1313 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

Kate Brown, Manager

Kati Brown

Energy/Combustion New Source Review Permits Section

Air Permits Division

Texas Commission on Environmental Quality

cc: Director, Harris County, Pollution Control Services, Pasadena

Project Number: 260978

#### Standard Permit Maximum Emission Rates Table Permit Number 143753

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

Emission Point No.	Source Name	NSR Permit	Pollutant	Authorized PCP Em	nissions
Ellission Foliit No.	Source Name	NSK FEITHU	ronutant	lbs/hr	tpy
			VOC	549.75	340.43
			Acetone	0.27	1.13
17E01	East Plant Flare	2128	NO <sub>x</sub>	56.35	36.22
			SO <sub>2</sub>	3.22	4.88
			CO	246.66	174.18

 $\begin{array}{cccc} VOC & - & volatile \ organic \ compounds \\ NO_x & - & total \ oxides \ of \ nitrogen \\ CO & - & carbon \ monoxide \\ SO_2 & - & sulfur \ dioxide \end{array}$ 

Date: December 19, 2016

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Toby Baker, *Executive Director* 



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 11, 2019

MR TOM WARNEMENT ENVIRONMENTAL MANAGER - AIR EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Re: Pollution Control Projects Air Quality Standard Permit

(Effective 2/9/2011)

Standard Permit Registration Number: 157394 Standard Permit Expiration Date: July 11, 2029

Equistar Chemicals LP

**Equistar Chemicals Channelview Complex** 

Affected Permit: 2128, 22779, 24677, 24887, 49130

Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

Dear Mr. Warnement:

This is in response to your Form PI-1S (Air Quality Standard Permit for Pollution Control Projects) regarding the proposed construction to be located at 8280 Sheldon Rd, Channelview, Harris. We understand that this registration is associated with the transfer of emissions from the IPOH Flare (EPN: 25E01) and the PolyBD Flare (EPN: 25E02) to the East Plant Flare (EPN: 17E01). Standard permit No. 143753 will be voided upon issuance of this standard permit. The emissions authorized by standard permit 143753 are included in the allowable emission rates for this standard permit.

After evaluation of the information you submitted, the Texas Commission on Environmental Quality (TCEQ) has determined that your proposed emissions are authorized by this standard permit pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602) if constructed and operated as represented in your registration. This standard permit was issued under the Texas Clean Air Act (TCAA) § 382.011, which authorizes the commission to control the quality of the state's air; TCAA § 381.023, which authorizes the commission to issue orders necessary to carry out the policy and purposes of the TCAA; and § 382.05195, which authorizes the commission to issue standard permits. Authorized emissions are listed on the attached table.

You must begin construction or modification of these facilities in accordance with this standard permit no later than 18 months after the date of this letter. After completion of construction or modification, the appropriate TCEQ Regional Office must be notified prior to commencing operation and the facility shall be operated in compliance with all applicable conditions of the claimed standard permit.

You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit be administratively incorporated into the affected facilities' permit(s) at the next amendment or renewal.

You are also reminded that these facilities must comply with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

Mr. Tom Warnement Page 2 July 11, 2019

Re: Standard Permit Registration Number 157394

If you need further information or have any questions, please contact Mr. Guillermo Reyes, P.E. at (512) 239-5716 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Mark Meyer, Manager Rule Registrations Section

Mark T. Meyer

Air Permits Division

Texas Commission on Environmental Quality

cc: Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Number: 303062

## Standard Permit Maximum Emission Rates Table Permit Number 157394

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

		71 00 00 10	1000	Authorized PCP Emissions	nissions
Emission Point No.	Source Name	Nok Permit	Pollutant	lbs/hr	tpy
			NOC	638.57	419.74
			NOX	68.22	48.38
17E01	East Plant Flare	2128	00	307.19	235.98
			SO <sub>2</sub>	39.74	37.34
			Acetone	11.18	8.18

volatile organic compounds VOC NO<sub>x</sub> CO PM PM<sub>2.5</sub> SO<sub>2</sub>

total oxides of nitrogen

carbon monoxide

total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented

total particulate matter equal to or less than 10 microns in diameter, including PM2.5 as represented

particulate matter equal to or less than 2.5 microns in diameter

sulfur dioxide

\*\*Fugitive emissions are an estimate only and should not be considered as a maximum allowable

Date: July 11, 2019

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



### **TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Protecting Texas by Reducing and Preventing Pollution

January 13, 2017

MR TODD MONETTE SITE MANAGER EQUISTAR CHEMICALS LP PO BOX 777 CHANNELVIEW TX 77530-0777

Re: Pollution Control Projects Air Quality Standard Permit

(Effective 2/9/2011)

Standard Permit Registration Number: 144030 Standard Permit Expiration Date: January 13, 2027

Equistar Chemicals, LP

**Equistar Chemicals Channelview Complex** 

Affected Permit: 2128 Channelview, Harris County

Regulated Entity Number: RN100542281 Customer Reference Number: CN600124705

Account Number: HG-0033-B

#### Dear Mr. Monette:

This is in response to your Form PI-1S (Air Quality Standard Permit for Pollution Control Projects) regarding the proposed construction to be located at 8280 Sheldon Road, Channelview, Harris County. We understand that this registration is for emissions associated with replacing the flare tip of the East Plant Flare Emission Point Number 17E01. You have represented that there is no increase or change in the character of the emissions.

After evaluation of the information you submitted, the Texas Commission on Environmental Quality (TCEQ) has determined that your proposed emissions are authorized by this standard permit pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602) if constructed and operated as represented in your registration. This standard permit was issued under the Texas Clean Air Act (TCAA) § 382.011, which authorizes the commission to control the quality of the state's air; TCAA § 381.023, which authorizes the commission to issue orders necessary to carry out the policy and purposes of the TCAA; and § 382.05195, which authorizes the commission to issue standard permits. Authorized emissions are listed on the attached table.

You must begin construction or modification of these facilities in accordance with this standard permit no later than 18 months after the date of this letter. After completion of construction or modification, the appropriate TCEQ Regional Office must be notified prior to commencing operation and the facility shall be operated in compliance with all applicable conditions of the claimed standard permit.

Mr. Todd Monette Page 2 January 13, 2017

Re: Standard Permit Registration Number 144030

You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit be administratively incorporated into the affected facilities' permit(s) at the next amendment or renewal.

You are also reminded that these facilities must be in compliance with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

If you need further information or have any questions, please contact Mr. Michael Cheek, P.E. at (512) 239-4936 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

Kati Brown

Kate Brown, Manager Energy/Combustion New Source Review Permits Section Air Permits Division Texas Commission on Environmental Quality

cc: Director, Harris County, Pollution Control Services, Pasadena

Project Number: 261649

## Standard Permit Maximum Emission Rates Table Permit Number 144030

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

	Consult Original	MCB Downsie	Dollutont	Authorized PCP Emissions	issions
Entission Point No.	Source Name	Non reliant	romatant	lbs/hr	tpy
		4	NOC	478.41	255.46
			C,H <sub>O</sub>	0.27	1.13
17E01	East Plant Flare	2128	NO.	46.69	28.85
			00	197.41	136.64
			so,	0.02	0.05

Flare emission limits include routine operations and Startup, Shutdown, and Maintenance (MSS) emissions.

volatile organic compounds total oxides of nitrogen

carbon monoxide sulfur dioxide acetone

Date: January 13, 2017

Date: 10/01/2019
Permit #: 2128
Company: Equistar

I. Additional Questions for	r Specific NSR Minor Permit Actions	

Date: 10/01/2019
Permit #: 2128
Company: Equistar


Date: 10/01/2019
Permit #: 2128
Company: Equistar

Date: 10/01/2019
Permit #: 2128
Company: Equistar

V. Nonattainment Permits	
	V
Complete the offsets section of the Federal Applicability sheet of this workbook.	Yes
Does the application contain a detailed LAER analysis? (attachment or as notes on the BACT sheet of this workbook)	Yes
Does the application contain an analysis of alternative sites, sizes, production processes, and control techniques for the proposed source? The analysis must demonstrate that the benefits of the proposed location and source configuration significantly outweigh the environmental and social costs of that locati+A124on.	Yes

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

l

#### VIII. Federal Regulatory Questions

Indicate if any of the following requirements apply to the proposed facility. Note that some federal regulations apply to minor sources. Enter all applicable Subparts.

#### A. Title 40 CFR Part 60

<u> 10/01/2019</u>
<u>2128</u>
Equistar

Do NCDC aubpart(a) apply to a								
Do NSPS subpart(s) apply to a facility in this application?	Yes							
List applicable subparts you will demonstrate compliance with								
(e.g. Subpart M)	A							
. ,								
B. Title 40 CFR Part 61								
Do NESHAP subpart(s) apply to a	Yes							
facility in this application?	100							
List applicable subparts you will								
demonstrate compliance with	A FF							
(e.g. Subpart BB)	A, FF							
C. Title 40 CFR Part 63								
Do MACT subpart(s) apply to a	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \							
facility in this application?	Yes							
List applicable subparts you will								
demonstrate compliance with								
(e.g. Subpart VVVV)	A, F, G, H							
(c.g. Subpart VVV)								
	IX. Emissions Review							
A. Impacts Analysis	IX. LIIIISSIOIIS NEVIEW							
	ease in off-property concentrations of air contaminants requires an	air quality						
	n regarding the air quality impacts demonstration must be provided							
	with all state and federal requirements. Detailed requirements for t							
		ie illioilliation						
necessary to make the demonstration are listed on the Impacts sheet of this workbook.								
Does this project require an impac	ts analysis?	Yes						
	B. Disaster Review							
	sufficient quantities of certain chemicals which, if released acciden							
	uld be immediately dangerous to life and health, a disaster review							
	Contact the appropriate NSR permitting section for assistance at	(512) 239-1250.						
Additional Guidance can be found	at:							
https://www.tceq.texas.gov/assets	/public/permitting/air/Guidance/NewSourceReview/disrev-factshee	t.pdf						
Does this application involve any a	air contaminants for which a disaster review is required?	No						
C. Air Pollutant Watch List								
Certain areas of the state have co	ncentrations of specific pollutants that are of concern. The TCEQ I	nas designated						
	ncentrations of specific pollutants that are of concern. The TCEQ I th list areas. Location of a facility in a watch list area could result in	-						
these portions of the state as watc	·	additional						
these portions of the state as watc	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location	additional						
these portions of the state as water restrictions on emissions of the aff and pollutants of interest can be fo	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location at:	additional						
these portions of the state as water restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location bund at: ogy/apwl/apwl.html	additional on of the areas						
these portions of the state as water restrictions on emissions of the aff and pollutants of interest can be fo	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location bund at: ogy/apwl/apwl.html	additional						
these portions of the state as water restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location bund at: ogy/apwl/apwl.html	additional on of the areas						
these portions of the state as water restrictions on emissions of the aff and pollutants of interest can be for https://www.tceq.texas.gov/toxicol	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location bund at: ogy/apwl/apwl.html	additional on of the areas						
these portions of the state as water restrictions on emissions of the affiliand pollutants of interest can be for <a href="https://www.tceq.texas.gov/toxicol">https://www.tceq.texas.gov/toxicol</a> Is the proposed facility located in a	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location of at:    ogy/apwl/apwl.html	additional on of the areas						
these portions of the state as water restrictions on emissions of the affi and pollutants of interest can be for <a href="https://www.tceq.texas.gov/toxicol">https://www.tceq.texas.gov/toxicol</a> Is the proposed facility located in a D. Mass Emissions Cap and Tra	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location of at:  ogy/apwl/apwl.html a watch list area?  de	additional on of the areas						
these portions of the state as water restrictions on emissions of the affi and pollutants of interest can be for <a href="https://www.tceq.texas.gov/toxicol">https://www.tceq.texas.gov/toxicol</a> Is the proposed facility located in a <a href="https://www.tceq.texas.gov/toxicol">D. Mass Emissions Cap and Tra</a> Is this facility located at a site with	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location of at:  ogy/apwl/apwl.html a watch list area?  de in the Houston/Galveston nonattainment area (Brazoria,	additional on of the areas						
these portions of the state as water restrictions on emissions of the affi and pollutants of interest can be for <a href="https://www.tceq.texas.gov/toxicol">https://www.tceq.texas.gov/toxicol</a> Is the proposed facility located in a state of the proposed facility located at a site with Chambers, Fort Bend, Galveston,	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location of a facility in a watch list area?    Ogy/apwl/apwl.html	No  Yes						
these portions of the state as water restrictions on emissions of the affi and pollutants of interest can be for <a href="https://www.tceq.texas.gov/toxicol">https://www.tceq.texas.gov/toxicol</a> Is the proposed facility located in a state of the proposed facility located at a site with Chambers, Fort Bend, Galveston,	ch list areas. Location of a facility in a watch list area could result in fected air pollutant(s) or additional permit requirements. The location of at:  ogy/apwl/apwl.html a watch list area?  de in the Houston/Galveston nonattainment area (Brazoria,	n additional on of the areas						

## Texas Commission on Environmental Quality Form PI-1 General Application Unit Types - Emission Rates

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

Permit primary industry (must be selected for workbook to function)

Action Requested (only 1 action per FIN)	summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Proposed Short-Term (lb/hr)	Proposed Long- Term (tpy)	(lb/hr)	(19)	Unit Type (Used for reviewing BACT and Monitoring Requirements)
Not New/Modified	Yes	EC4D3001	EC4D3001	D-3001 Analyzer Vent		0.19	0.85	0	0	Process Vent
Not New/Modified	Yes	EC4PVJ304	EC4PVJ304	Analyzer Vent	VOC	0.0003	0.001	0	0	Process Vent
	Yes	EC4PVJ309	EC4PVJ309	Analyzer Vent	VOC	0.0004	0.002	0	0	Process Vent
lot New/Modified	Yes	EC4PVJ317	EC4PVJ317	Analyzer Vent	VOC	0.002	0.01	0	0	Process Vent
lot New/Modified	Yes	EC4PVJ1205	EC4PVJ1205	Analyzer Vent	VOC	0.002	0.01	0	0	Process Vent
lot New/Modified	Yes	EC4PVJ1206	EC4PVJ1206	Analyzer Vent	voc	0.001	0.004	0	0	Process Vent
lot New/Modified	Yes	EMTPVJ1204	EMTPVJ1204	Analyzer Vent	VOC	0.0003	0.001	0	0	Process Vent
lot New/Modified	Yes	EMTPVJ1207	EMTPVJ1207	Analyzer Vent	VOC	0.0004	0.002	0	0	Process Vent
lot New/Modified	Yes	EC4TO	EC4TO	Thermal Oxidizer (R- 309)	voc	0.14	0.63	0	0	Control: Oxidizer: Thermal
lot New/Modified	Yes				NOx	0.32	1.41	0	0	
	Yes				CO	0.77	3.38	0	0	
	Yes				SO2	0.003	0.01	0	0	
ot New/Modified	Yes				PM	0.8	3.48	0	0	
ot New/Modified	Yes	F1203	EF1203	Regengeration Heater (KLP)	voc	0.03	0.05	0	0	Heater
lot New/Modified	Yes			l í	NOx	0.15	0.24	0	0	
	Yes				CO	0.22	0.36	0	0	
	Yes				SO2	0.003	0.01	0	0	
	Yes				PM	0.04	0.07	0	0	
ot New/Modified	Yes	F1202	EF1202	Thermal Oxidizer	VOC	0.57	0.93	0	0	Control: Oxidizer: Thermal
	Yes	1 1202	ET TEGE	THOTHUI GALLEDI	NOx	1.35	2.19	0	0	CONTROL CAGEST. THORNER
	Yes				CO	3.21	5.2	0	0	
	Yes				SO2	0.01	0.02	0	0	
ot New/Modified	Yes				PM	0.17	0.28	0	0	
ot New/Modified	Yes	03HTF302	3E06	Regeneration Heater (F302)	voc	0.02	0.05	0	0	Heater
lot New/Modified	Yes			(. 442)	NOx	0.63	1.36	0	0	
	Yes				CO	0.38	0.82	0	0	
ot New/Modified	Yes				SO2	0.000003	0.00001	0	0	
ot New/Modified	Yes				PM	0.03	0.07	0	0	
Consolidate	Yes	03FG00000, 08FG00000, 01FG00000, 16FG00000, 24FG00000, 09FG00000	F3E00, F12E00, F8E00, F1E00, F16E00, F24E00, F9E00	Unit Equipment Fugitives (East and West Train Service, and East Plant Utility Areas)	voc	9.98	39.24	0.0001	0.0001	Fugitives: Piping and Equipment Leak
Not New/Modified	Yes				Acetone	0.09	0.35	0	0	
lew/Modified	Yes	17FL1701, 17FL1701F, 17FL1701P	17E01	East Plant Flare	voc	595.3	393.51	0.4	0.72	Control: Flare
lew/Modified	Yes				Acetone	14.18	8.07	0	0	
ew/Modified	Yes				NOx	66.81	51.06	4.99	9.11	
ew/Modified	Yes				SO2	5.52	8.27	2.29	3.37	
ew/Modified	Yes				CO	299.99	249.79	25.45	46.44	
ot New/Modified	Yes	ENMSSROUT	ENMSSROUT	Maintenance Emissions (KLP)	voc	4.11	0.02	0	0	MSS Activities

## Texas Commission on Environmental Quality Form PI-1 General Application Stack Parameters

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

Emission Point Discharge Parameters												
		UTM Coordinates				Height	Stack Exit					Fugitives -
	Included in		East	North	Building		Diameter	Velocity	Temperature	Fugitives -		Axis
EPN	EMEW?	Zone	(Meters)	(Meters)	Height (ft)	Ground (ft)	(ft)	(FPS)	(°F)	Length (ft)	Width (ft)	Degrees
EC4D3001	No	15	295983	3302167								
EC4PVJ304	No	15	295993	3302166								
EC4PVJ309	No	15	295904	3302203								
EC4PVJ317	No	15	295929	3302272								
EC4PVJ1205	No	15	295810	3302271								
EC4PVJ1206	No	15	295817	3302325								
EMTPVJ1204	No	15	295786	3302353								
EMTPVJ1207	No	15	295831	3302256								
EC4TO	No	15	295879	3302320	50		1.67	51.4	1400			
EF1203	No	15	295782	3302267	60		1.92		600			
EF1202	No	15	295771	3302265	75		4	57	1600			
3E06	No	15	295867	3302320	68		2.5	4.2	465			
F3E00, F12E00, F0E00, F1E00,	Yes											
17E01	Yes											
ENMSSROUT	No	15	295752	3302259						235	220	

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

No

I. Public Notice Applicability						
A. Application Type						
Is this an application for a new or major mod	dification of a PSD (including GHG), Nonattainment, or HAP permit?	Yes				
Is this an application for a minor permit ame	ndment?	Yes				
Is there any change in character of emission species)?	ns in this application (a new criteria pollutant or a new VOC or PM	No				
Is there a new air contaminant in this applica	ation?	No				
	nresholds (for Initial and Amendment Projects)					
standardized emission factors, or reductions emissions increase would be the sum of em amended permit for each air contaminant.	ges to permitted allowable emission rates when exclusively due to chas in emissions which are not enforceable through the amended permit issions increases under the amended permit and the emissions decre eases based on the values represented on the "Unit Types - Emission	. Thus, the total eases under the				
Use the "yes" and "no" options in column B of emissions should be included in these tot	of the "Unit Types - Emission Rates" worksheet to indicate if a unit's p als.	roposed change				
These emissions will be speciated based or public notice requirements may change duri	ay have been previously quantified and authorized as PM, PM10,and/ a current guidance and policy to demonstrate compliance with current ng the permit review.					
All renewals require public notice.						
This row is optional. If you do not think the table below accurately represents public notice applicability increases for your project, provide discussion here (1000 characters).						

Version 4.0 Page 1

vegetable fibers (agricultural facilities)?

Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or

Date: \_\_10/01/2019\_ Permit #: \_\_2128\_ Company: \_\_Equistar\_

Current Long- Term (tpy)	Consolidated Emissions (tpy)	Proposed Long- Term (tpy)	Project Change in Allowable (tpy)	PN Threshold	Notice required?
296.66	137.93	435.31	0.72	5	
3.90	0.00	3.90	0.00	5	No
0.00	0.00	0.00	0.00	5	No
0.00	0.00	0.00	0.00	5	No
34.05	13.10	56.26	9.11	5	Yes
146.40	66.71	259.55	46.44	50	No
0.09	4.85	8.31	3.37	10	No
0.00	0.00	0.00	0.00	0.6	No
1.48	6.94	8.42	-4.44089E-16	5	No
	Term (tpy)  296.66  3.90  0.00  0.00  34.05  146.40  0.09  0.00	Term (tpy)         Emissions (tpy)           296.66         137.93           3.90         0.00           0.00         0.00           0.00         0.00           34.05         13.10           146.40         66.71           0.09         4.85           0.00         0.00	Term (tpy)         Emissions (tpy)         Term (tpy)           296.66         137.93         435.31           3.90         0.00         3.90           0.00         0.00         0.00           0.00         0.00         0.00           34.05         13.10         56.26           146.40         66.71         259.55           0.09         4.85         8.31           0.00         0.00         0.00	Current Long-Term (tpy)         Consolidated Emissions (tpy)         Proposed Long-Term (tpy)         in Allowable (tpy)           296.66         137.93         435.31         0.72           3.90         0.00         3.90         0.00           0.00         0.00         0.00         0.00           0.00         0.00         0.00         0.00           34.05         13.10         56.26         9.11           146.40         66.71         259.55         46.44           0.09         4.85         8.31         3.37           0.00         0.00         0.00         0.00	Current Long-Term (tpy)         Consolidated Emissions (tpy)         Proposed Long-Term (tpy)         in Allowable (tpy)         Proposed Long-Threshold           296.66         137.93         435.31         0.72         5           3.90         0.00         3.90         0.00         5           0.00         0.00         0.00         0.00         5           0.00         0.00         0.00         5           34.05         13.10         56.26         9.11         5           146.40         66.71         259.55         46.44         50           0.09         4.85         8.31         3.37         10           0.00         0.00         0.00         0.00         0.6

<sup>\*\*</sup> Notice of a GHG action is determined by action type. Initial and major modification always require notice. Voluntary updates require a consolidated notice if there is a change to BACT. Project emission increases of CO2e (CO2 equivalent) are not relevant for determining public notice of GHG permit actions.

C. Is public notice required for this project as represented in this workbook?	Yes
If no, proceed to Section III Small Business Classification.	
Note: public notice applicability for this project may change throughout the technical review.	
D. Are any HAPs to be authorized/re-authorized with this project? The category "HAPs" must	No
be specifically listed in the public notice if the project authorizes (reauthorizes for renewals) any	
HAP pollutants.	
HAP pollutants.	

#### **II. Public Notice Information**

Complete this section if public notice is required (determined in the above section) or if you are not sure if public notice is required.

#### A. Contact Information

Enter the contact information for the **person responsible for publishing.** This is a designated representative who is responsible for ensuring public notice is properly published in the appropriate newspaper and signs are posted at the facility site. This person will be contacted directly when the TCEQ is ready to authorize public notice for the application.

Prefix (Mr., Ms., Dr., etc.):	Mrs.
First Name:	Teresa
Last Name:	Peneguy
Title:	Environmental Permitting

Date: \_10/01/2019\_ Permit #: \_\_2128\_ Company: \_Equistar\_

Company Name:	LyondellBasell
Mailing Address:	PO Box 777
Address Line 2:	
City:	Channelview
State:	Texas
ZIP Code:	77530
Telephone Number:	281-452-8330
Fax Number:	
Email Address:	teresa.peneguy@lyb.com
Enter the contact information for the notice as a contact for additional in	he <b>Technical Contact</b> . This is the designated representative who will be listed in the public information.
Prefix (Mr., Ms., Dr., etc.):	Mrs.
First Name:	Teresa
Last Name:	Peneguy
Title:	Environmental Permitting
Company Name:	LyondellBasell
Mailing Address:	PO Box 777
Address Line 2:	
City:	Channelview
State:	Texas
ZIP Code:	77530
Telephone Number:	281-452-8330
Fax Number:	
Email Address:	teresa.peneguv@lyb.com

#### B. Public place

Place a copy of the full application (including all of this workbook and all attachments) at a public place in the county where the facilities are or will be located. You must state where in the county the application will be available for public review and comment. The location must be a public place and described in the notice. A public place is a location which is owned and operated by public funds (such as libraries, county courthouses, city halls) and cannot be a commercial enterprise. You are required to pre-arrange this availability with the public place indicated below. The application must remain available from the first day of publication through the designated comment period.

If this is an application for a PSD, nonattainment, or FCAA §112(g) permit, the public place must have internet access available for the public as required in 30 TAC § 39.411(f)(3).

If the application is submitted to the agency with information marked as Confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC 197, P.O. Box 13087, Austin, Texas 78711-3087.

Name of Public Place:	North Channel Branch Library				
Physical Address:	15741 Wallisville Road				
Address Line 2:					
City:	Houston				
ZIP Code:	77049				
County:	Harris				
Has the public place granted authorization to place the application for public viewing and copying?		Yes			
Does the public place have Internet acces	ss available for the public?	Yes			

Date: _	_ <u>10/01/2019</u>
Permit #:	<u>2128</u>
Company:	Equistar

#### C. Alternate Language Publication

In some cases, public notice in an alternate language is required. If an elementary or middle school nearest to the facility is in a school district required by the Texas Education Code to have a bilingual program, a bilingual notice will be required. If there is no bilingual program required in the school nearest the facility, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be required. If it is determined that alternate language notice is required, you are responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

Is a bilingual program required by the Tex District?	Yes			
Are the children who attend either the elemonder to your facility eligible to be enrolle the district?	Yes			
If yes to either question above, list which bilingual program?	Spanish			
D. PSD and Nonattainment Permits Onl		·		
If this is an application for emissions of GI "Consolidated Public Notice". Note: Separ			Not applicable	
We must notify the applicable county judg is received. This information can be obtain <a href="https://www.txdirectory.com">https://www.txdirectory.com</a> Provide the information for the <b>County Ju</b>	ned at:			
The Honorable:	Lina Hidalgo			
Mailing Address:	1001 Preston, Suite 911			
Address Line 2:	,			
City:	Houston			
State:	Texas			
ZIP Code:	77002			
Provide the information for the <b>Presiding</b>	Officer(s) of the municipality for this fa	cility site. This is f	requently the Mayor.	
First Name:	Adrian			
Last Name:	Garcia			
Title:	County Commissioner			
Mailing Address:				
Address Line 2:	4500 E Sam Houston PKWY S Ste 21	5		
City:	Pasadena			
State:	Texas			
ZIP Code:	77505			
Are the proposed facilities located within 100 km or less of an affected state or Class I Area?	No			

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

III. Small Business Classification	
Complete this section to determine small business classification. If a small business requests a permit, agency rul 39.603(f)(1)(A)) allow for alternative public notification requirements if all of the following criteria are met. If these rmet, public notice does not have to include publication of the prominent (12 square inch) newspaper notice.	` •
Does the company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?	No
Small business classification:	No

## Texas Commission on Environmental Quality Form PI-1 General Application Federal Applicability

Date: 10/01/2019
Permit #: 2128
Company: Equistar

	I. County Class	sification	
Does the project require retrospective review?		No	
boes the project require retrospective review:		NO .	
County (completed for you from your response on the	ne General sheet)	Harris	
This project will be located in an area that is in attain Sept. 23, 2019. Select from the drop-down list to the the project to be reviewed under a different classific	e right if you would like	Ozone - Serious	
Determination:	This project will be located in a county with a Serious Ozone nonattainment classification, and the project will be reviewed under a Serious Ozone nonattainment classification. Complete the nonattainment section below and provide an analysis wit the application.		a Serious Ozone nonattainment
11	PSD and GHG PSD App	olicability Summary	
Is netting required for the PSD analysis for this		onouthing Cummary	No
to nothing required for the rest undryste for this p			No
Pollutant	Project Increase	Threshold	PSD Review Required?
co	46.44	100	No
NO <sub>x</sub>	9.11	40	No
PM	0	25	No
PM <sub>10</sub>	0	15	No
PM <sub>2.5</sub>	0	10	No
SO <sub>2</sub>	3.37	40	No
Pb			
H₂S			
TRS			
Reduced sulfur compounds (including H <sub>2</sub> S)			
H <sub>2</sub> SO <sub>4</sub>			
Fluoride (excluding HF)			
CO2e			
	II. Nonattainment Appli	icability Summary	
Is netting required for the nonattainment analys			Yes
If yes, the project increases listed below should be a			nation to the application.
Pollutant	Project Increase (after netting)	Threshold	NA Review Required?

## Texas Commission on Environmental Quality Form PI-1 General Application Federal Applicability

Date: 10/01/2019
Permit #: 2128
Company: Equistar

Ozone (as VOC)	0.72	40	No
Ozone (as NO <sub>x</sub> )	9.11	5	Yes

	iv. Onset Summary	(for Nonattainment Permits)	
Pollutant	Offset Ratio	Offset Quantity Required (tpy)	Where is the offset coming from
Ozone (as NO <sub>x</sub> )	1.20 : 1	10.932	Purchase
	·	·	·

I. General Information - Non-Renewal		
Is this project for new facilities controlled and operated directly by the federal government? (30 TAC § 116.141(b)(1) and 30 TAC § 116.163(a))		No
A fee of \$75,000 shall be required if no estimate of capital project cost is included with the permit application. (30 TAC § 116.141(d)) Select "yes" here to use this option. Then skip sections II and III.		No
Select Application Type	Major Application	

II. Direct Costs - Non-Renewal		
Type of Cost	Amount	
Process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	\$0.00	
Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	\$0.00	
Freight charges.	\$0.00	
Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	\$0.00	
Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	\$0.00	
Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	\$0.00	
Ambient air monitoring network.	\$0.00	
Sub-Total:	\$0.00	

III. Indirect Costs - Non-Renewal		
Type of Cost	Amount	
Final engineering design and supervision, and administrative overhead.	\$0.00	
Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	\$0.00	
Contractor's fee and overhead.	\$0.00	
Sub-Total:	\$0.00	

#### IV. Calculations - Non-Renewal

For GHG permits: A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application. Identify these other fees in the GHG PSD permit application.

In signing the "General" sheet with this fee worksheet attached, I certify that the total estimated capital cost of the project as defined in 30 TAC §116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Estimated Capital Cost	Major Application Fee
------------------------	-----------------------

# Texas Commission on Environmental Quality Form PI-1 General Application Fees

Date: 10/01/2019
Permit #: 2128
Company: Equistar

Less than \$300,000	\$3,000 (minimum fee)
\$300,000 - \$7,500,000	1.0% of capital cost
\$300,000 - \$25,000,000	N/A
Greater than \$7,500,000	\$75,000 (maximum fee)
Greater than \$25,000,000	N/A

Your estimated capital cost:	\$0.00	Minimum fee applies.
Permit Application Fee:		\$3,000.00

VI. Total Fees		
Note: fees can be paid together with one payment or as two separate payments.		
Non-Renewal Fee	\$3,000.00	
Total	\$3,000.00	

VII. Payment Information					
A. Payment One (required)					
Was the fee paid online?		No			
Enter the fee amount:		\$	3,000.00		
Enter the check, money order, ePay Voucher, or other transaction number:	WRS0019798				
Enter the Company name as it appears on the check:	Equistar Chemicals LP				
C. Total Paid			\$3,000.00		

VIII. Professional Engineer Seal Requirement		
Is the estimated capital cost of the project above \$2 million?	No	
Is the application required to be submitted under the seal of a Texas licensed P.E.? Note: an electronic PE seal is acceptable.	No	

# Texas Commission on Environmental Quality Form PI-1 General Application Impacts

Date: 10/01/2019
Permit #: 2128
Company: Equistar

Pollutant	require PSD	How will you demonstrate that this project meets all applicable requirements?	Notes	Additional Notes (optional)
Ozone	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
voc	No	MERA steps 0-2 AND Modeling (screen or	Attach both an "Electronic Modeling Evaluation Workbook" (EMEW) AND a detailed description of which MERA step was met. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.	
NOx	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
со	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
SO2	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
PM	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
Acetone	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	

# Texas Commission on Environmental Quality Form PI-1 General Application BACT

Date: <u>10/01/2019</u>
Permit #: <u>2128</u>
Company: <u>Equistar</u>

Plant Type				Current Tier I BACT	Confirm	Additional Notes
Plant fuel gas facility				Maximum short term H2S emissions: 0.1 gr/dscf or 160 ppmv. Maximum annual H2S	Yes	
r lant raoi gao laointy				maximan one comment of the comment o		
Action Requested	FINs	Unit Type	Pollutant	Current Tier I BACT	Confirm	Additional Notes
Consolidate	03FG00000, 08FG00000, 01FG00000, 16FG00000, 24FG00000, 09FG00000	Fugitives: Piping and Equipment Leak		Specify which is applicable:  1. Uncontrolled VOC emissions < 10 tpy: none  2. 10 tpy < uncontrolled VOC emissions < 25 tpy: 28M leak detection and repair program. 75% credit for 28M.  3. Uncontrolled VOC emissions > 25 tpy: 28VHP leak detection and repair program. 97% credit for valves, 85% for pumps and compressors.  4. VOC vp < 0.002 psia: no inspection required, no fugitive emissions expected.  For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. Appropriate credit for AVO program.	Yes	28VHP
			Acetone	See additional notes:	Yes	Monitoring Per 28VHP
	_					
					_	
			MSS	Same as normal operation BACT requirements.	Yes	No changes to MSS
	17FL1701,		11100	VOC: Meets 40 CFR 60.18. Destruction Efficiency: 99% for certain compounds up to	163	INO Granges to Mico
New/Modified	17FL1701,	Control: Flare	voc	three carbons, 98% otherwise. No flaring of halogenated compounds is allowed. Flow	Yes	Meets 98% control efficiency and 99% for compounds up to 3 carbons
rvcw/iviodilica	17FL1701P	Control: Flare	1,00	monitor required. Composition or BTU analyzer may be required.	103	inceed 30 % control efficiency and 33 % for compounds up to 3 carbons
	177 217 011		Acetone	See additional notes:	Yes	Meets 98% control efficiency
			NOx	Provide emission factor used and reference.	Yes	Use TCEQ factor of 0.068 lb/MMBtu for low Btu, steam-assisted flare
			SO2	Provide emission factor used and reference.	Yes	Natural gas has less than 5 grains/100 dscf
			CO	Provide emission factor used and reference.	Yes	Use TCEQ factor of 0.3465 lb/MMBtu for low Btu, steam-assisted flare
						The state of the s
			MSS	Same as normal operation BACT requirements.	Yes	No changes to MSS

### **Texas Commission on Environmental Quality** Form PI-1 General Application Monitoring

Date: _	<u> 10/01/2019</u>
Permit #:	2128
Company:	Equistar

#### Monitoring

This sheet provides the minimum acceptable requirements to demonstrate compliance through monitoring for each pollutant proposed to be emitted from each FIN. This sheet also includes measuring techniques for sources of significant emissions in the project.

1. The unit types listed under Unit Type (column B) include all new, modified, consolidated, and/or renewed sources as indicated on the "Unit Types - Emission Rates" sheet. Each new, modified, consolidated, and/or renewed source must address how compliance will be demonstrated.

2. The pollutants listed in Pollutant (column C) include the pollutants indicated on the "Unit Types - Emission Rates" sheet.

#### Monitoring (30 TAC § 116.111(a)(2)(G))

- The minimum acceptable monitoring is automatically populated for each unit type and pollutant.
   Additional monitoring may be required, particularly for Title V sources, and will be included in the NSR and/or Title V permits.
- Fully expand the Minimum Monitoring Requirements (column D) by increasing the row heights so all text is visible. (Place the cursor on the bottom of the number line to the far left of the screen, click and drag downward until all text is visible.)
- 5. Review the monitoring and confirm that you will meet all representations listed on the sheet and any additional attachments by entering or selecting "Yes" in Confirm (column E).

  6. Add additional notes as necessary in Additional Notes for Monitoring (column F), limited to 500 characters or fewer. Examples include the following:
- Proposed monitoring for pollutants or units that list "See additional notes:";
- Details requested in the populated data;
- Alternative monitoring you are proposing; and
   Any additional information relevant to the minimization of emissions.
- . Cap EPNs do not need monitoring (leave those rows blank).

#### Measurement of Emissions (30 TAC § 116.111(a)(2)(B))

Note: this section will be greyed out if this project does not require PSD or nonattainment review, as represented on the General sheet.

- For each pollutant with a project increase greater than the PSD significant emission rate, select the proposed measurement technique using the dropdown (column G).
- 8. For each pollutant with a project increase less than the PSD significant emission rate: leave blank.
- . If selecting "other", provide details in Additional Notes for Measuring (column H).
- 10. You may also use the Additional Notes for Measuring (column H) to provide more details on a selection.

Important Note: The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours. All required records must be maintained in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application. The site must make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner. The applicant must comply with any additional recordkeeping requirements specified in special conditions in the permit. All records must be retained in the file for at least two years following the date that the information or data is obtained. Some permits are required to maintain records for five years. [30 TAC § 116.115(b)(2)(E)]

		Pollutant	Minimum Monitoring Requirements	Confirm		Proposed Measurement Technique (only complete for pollutants with a project increase above the PSD threshold)	Additional Notes for Measuring:
03FG00000, 08F0	Fugitives: Piping and	VOC	Use EPA Method 21 to monitor for leaks from seals on pumps,		Flow 28VHP monitoring requirements		
		Acetone	See additional notes:	Yes	Flow 28VHP monitoring requirements		
17FL1701, 17FL1	Control: Flare			Yes	Vent flow meter and stream analyzer		
			See additional notes:	Yes	Vent flow meter and stream analyzer		
				Yes	Vent flow meter and stream analyzer		
			Pilot flame presence monitored continuously. Waste gas flow and		vendor specification		
		co	Pilot flame presence monitored continuously. Waste gas flow and	Yes	Vent flow meter and stream analyzer		

### Texas Commission on Environmental Quality Form PI-1 General Application Materials

Date: 10/01/2019
Permit #: 2128
Company: Equistar

Item	How submitted	Date submitted
A. Administrative Information	How Submitted	Date Submitted
Form PI-1 General Application	Email	11/19/2019
Hard copy of the General sheet with original (ink) signature	Mail	11/19/2019
Professional Engineer Seal	Not applicable	11/19/2019
B. General Information	[Not applicable	
Copy of current permit (both Special Conditions and MAERT)		
Core Data Form		
	Mail	11/19/2019
Area map	Mail	11/19/2019
Plot plan	1112	11/19/2019
Process description	Mail	
Process flow diagram List of MSS activities	Mail	11/19/2019
	M 3	44/40/0040
State regulatory requirements discussion	Mail	11/19/2019
C. Federal Applicability		1444010040
Summary and project emission increase determination - Tables 1F and 2F	Mail	11/19/2019
Netting analysis (if required) - Tables 3F and 4F as needed	Not applicable	
D. Technical Information	I=	Leverse
BACT discussion, if additional details are attached	Email	11/19/2019
Monitoring information, if additional details are attached	<u>Email</u>	11/19/2019
Material Balance (if applicable)	Not applicable	
Calculations	Email	11/19/2019
E. Impacts Analysis		
Qualitative impacts analysis		
MERA analysis	Email	11/19/2019
Electronic Modeling Evaluation Workbook: SCREEN3	Email	11/19/2019
Electronic Modeling Evaluation Workbook: NonSCREEN3	Not applicable	
PSD modeling protocol		
F. Additional Attachments		
Expedited Fee	Mail	11/19/2019

## Electronic Modeling Evaluation Workbook for SCREEN3 General

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

EMEW Version No.: Version 2.2

#### **Purpose Statement:**

This workbook is completed by the applicant and submitted to the Texas Commission on Environmental Quality (TCEQ), specifically, the Air Dispersion Modeling Team (ADMT) for review. This workbook is a tool available for all projects using SCREEN3 for an impacts review and its use is required starting June 1, 2019. Provide the workbook with the permit application submittal for any Minor New Source Review project requiring a modeling impacts demonstration.

This workbook follows the guidance outlined in the Air Quality Modeling Guidelines (APDG 6232, September 2018) which can be found here:

https://www.tceq.texas.gov/assets/public/permitting/air/Modeling/guidance/airquality-mod-quidelines6232.pdf

#### **Workbook Instructions:**

- 1. Save a copy of the workbook to your computer or desktop prior to entering data.
- Complete all required sections leaving no blanks. You may use the "tab" button or the arrow keys to move to the next available cell. Use "enter" to move down a line. Note: drop-downs are case-sensitive.
- 3. Fill in the workbook in order, do not skip around as this will cause errors. Use caution if changing a previously entered entry.
- 4. Not applicable sections of this workbook will be hidden as data is entered. For example, answering "No" to "Is downwash applicable?" will hide these sections of the workbook required only for downwash entry.
- 5. Email the workbook electronic file (EMEW) and any attachments to the Air Permits Initial Review Team. The subject line should read "Company Name Permit Number (if known) NSR Permit Application". Email address:

#### apirt@tceq.texas.gov

- 6. If printing the EMEW, follow the directions below to create a workbook header.
- 7. Printing the EMEW is not required for submitting to the Air Permits Division (APD); however, you may need to print it for sending to the regional offices, local programs, and for public access if notice is required. To print the workbook, follow the instructions below. Please be aware, several sheets contain large amounts of data and caution should be taken if printing, such as the Speciated Emissions sheet.
- 8. Updates may be necessary throughout the review process. Updated workbooks must be submitted in electronic format to APD. For submittal to regional offices, local programs, or public places you only have to print sheets that had updates. Be sure to change the headers accordingly.

**Note:** Since this will be part of the permit application, follow the instructions in the Form PI-1 General Application on where to send copies of your EMEW and permit application. The NSR Application Workbook can be found <a href="https://www.tceq.texas.gov/permitting/air/quidance/newsourcereview/nsrapp-tools.html">https://www.tceq.texas.gov/permitting/air/quidance/newsourcereview/nsrapp-tools.html</a>

#### **Create Headers Before Printing:**

- 1. Right-click one of the workbook's sheet tabs and "Select All Sheets."
- 2. Enter the "Page Layout View" by using the navigation ribbon's View > Workbook Views > Page Layout, or by clicking the page layout icon in the lower-right corner of Excel.
- 3. Add the date, company name, and permit number (if known) to the upper-right header. Note that this may take up to a minute to update your spreadsheet. Select any tab to continue working on the spreadsheet.

#### **Printing Tips:**

While APD does not need a hard copy of the full workbook, you may need to print it for sending to the regional offices, local programs, and for public access if notice is required.

- 1. The default printing setup for each sheet in the workbook is set for the TCEQ preferred format. The print areas are set up to not include the instructions on each sheet.
- 2. You have access to change all printing settings to fit your needs and printed font size. Some common options include:
  - -Change what area you are printing (whole active sheet or a selection);
  - -Change the orientation (portrait or landscape);
  - -Change the margin size; and
  - -Change the scaling (all columns on one sheet, full size, your own custom selection, etc.).

## Electronic Modeling Evaluation Workbook for SCREEN3 General

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

	Select from the drop down:	
Evaluation Workbook and any requested data, I have not cha	tting an authorized TCEQ Electronic Modeling necessary attachments. Except for inputting the nged the TCEQ Electronic Modeling Evaluation g but not limited to changing formulas, formatting,	Choose an item
	Administrative Information:	
Data Type:	Facility Information:	
Project Number (6 Digits):		
Permit Number:	2128	
Regulated Entity ID (9 Digits):	100542281	
Facility Name:	Equistar Channelview	
Facility Address:	8280 Sheldon Road	
Facility County (select one):	Harris	
Company Name:	Equistar Chemicals, LP	
Company Contact Name:	Teresa Peneguy	
Company Contact Number:	281-452-8330	
Company Contact Email:	teresa.peneguy@lyb.com	
Modeling Contact Name:	Teresa Peneguy	
Modeling Company Name, as applicable:	LyondellBasell	
Modeling Contact Number:	281-452-8330	
Modeling Contact Email:	teresa.peneguy@lyb.com	
New/Existing Site (select one):	Existing Site	
Modeling Date (MM/DD/YYYY):	10/10/2019	
UTM Zone (select one):	15	

Sheet Instructions: Indicate in the Table of Contents which sections are applicable and included for this modeling demonstration. Select "X" from the drop down if the item below is included in the workbook. Note: This workbook is only for SCREEN3 analyses. Please use the separate Electronic Modeling Evaluation Workbook (EMEW) for the following air dispersion models: AERSCREEN, ISC/ISCPrime, and/or AERMOD.

Table of Contents				
Section:	Sheet Title (Click to jump to specific sheet):	Select an X from the dropdown menu if included:		
1	General			
2	Model Options	X		
3	Building Downwash	X		
4	Flare Source Parameters	X		
5	Point Source Parameters			
6	Area Source Parameters	X		
7	Volume Source Calculations			
8	Volume Source Parameters			
9	Point and Flare Source Emissions	X		
10	Area Source Emissions	X		
11	Volume Source Emissions			
12	Speciated Emissions	X		
13	Intermittent Sources			
14	Modeling Scenarios	X		
15	Monitor Calculations			
16	Background Justification			
17	Secondary PM2.5 Analysis (MERPs calculations)			
18	NAAQS/State Property Line (SPL) Modeling Results	X		
19	Unit Impact Multipliers	X		
20	Health Effects Modeling Results	X		
21	Modeling File Names	X		
22	Speciated Chemicals	X		

# Electronic Modeling Evaluation Workbook for SCREEN3 General

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

Included Attachments Instructions: The following are attachments that must be included with any modeling analysis. If providing the plot plan and area map with the permit application, ensure there is also a copy with the EMEW. The copy can be electronic.	Select an X from the dropdown menu if included:
Plot Plan:	
Instructions: Mark all that apply in the attached plot plan. For larger properties or dense sou multiple zoomed in plot plans that are legible.	rce areas, provide
Property/Fence Lines all visible and marked.	X
North arrow included.	X
Clearly marked scale.	X
All sources and buildings are clearly labeled.	Х
Area Map:	
Instructions: Mark all that apply in the attached area map.	
Annotate schools within 3,000ft of source's nearest property line.	X
All property lines are included.	X
Non-industrial receptors are identified.	X
Additional Attachments (as applicable):  Note: These are just a few examples of attachments that may need to be included. There may be others depending on the scope of the modeling analysis.  Single Property Line Designation	Select an X from the dropdown menu if included:
Include Agreement, Order, and map defining each petitioner.	X
Post Processing using Unit Impact Multipliers (UIMs)	,
Include documentation on any calculations used with the UIMs (i.e., Step 3 of the MERA).	
Modeling Techniques	
Provide documentation on modeling techniques indicated in the workbook.	
Other Attachments  Provide a list in the box below of additional attachments being provided that are not listed a	bove:
	Choose an item

Electronic Modeling Evaluation Workbook for SCREEN3

Model Options

	Date: <sub>.</sub>	_10/1	10/2019
	Perm	nit #:	2128
Company	Name:	E	Equista

#### II. Air Dispersion Modeling Preliminary Information

**Instructions:** Fill in the information below based on your modeling setup. The selections chosen in this sheet will carry throughout the sheet and workbook. Based on selections below, only portions of the sheet and workbook will be available. Therefore, it is vital the sheet and workbook are filled out in order, do NOT skip around.

For larger text boxes, double click to type or insert text.

Α	A. Building Downwash							
Ν	lo	Is downwash applicable? (Select "Yes" or "No")						
В	B. Type of Analyses: (Select "X" in all that apply)							
X	X Minor NSR NAAQS X State Property Line							
X		Health Effects						

Texas Commission on Environmental Quality Electronic Modeling Evaluation Workbook for SCREEN3 **Model Options** 

	Date: _	_10/	10/2019
	Perm	it #:	2128
Company	Name:		Equistar

C. Constituents Evaluating: (Select "X" in all that apply)								
NAAQS: Li	st all pollutants that require	an modeling	review. (Select "X" in all that apply)					
Х	SO <sub>2</sub>		PM <sub>10</sub>					
Х	со		PM <sub>2.5</sub>					
	Pb	X	NO <sub>2</sub>					
Both			Identify which averaging periods are being evaluated for NO <sub>2</sub> .					
Tier 2: 0.9			Identify the 1-hr NO <sub>2</sub> tier used for SCREEN3.					
Tier 2: 0.9			Identify the annual NO <sub>2</sub> tier used for SCREEN3.					
State Prope	erty Line: List all pollutants	that require	an modeling review. (Select "X" in all that					
	H <sub>2</sub> S	Χ	SO <sub>2</sub>					
	H <sub>2</sub> SO <sub>4</sub>		ı					
Health Effe numbers, ar	•	missions she	eet with all applicable pollutants, CAS					
	on Options: Select "X" in the sure to explain the reasoning		ct an option. Note: if selecting both the box below.					
Х	Urban							
	Rural							
Provide just	ification on the dispersion o	ption selecte	ed above in the following box:					
Located in r	nunicipality of Channelview	Texas						

## Texas Commission on Environmental Quality Electronic Modeling Evaluation Workbook for SCREEN3 **Model Options**

	Date: _	_10/	/10/2019
	Perm	it #:	2128
Company	Name:		Equistar

E. Meteorological Data:	
Select Meteorological Dataset Modeled:	Full Meteorological Data
F. Receptor Grid:	
Describe the receptor grid being modeled in the foll	owing text box:
10 m - 25000 m array; at ground level	3
G. Terrain:	
Select the terrain option being modeled:	Flat
For justification on terrain selection, fill in the box be	elow:
Land is costal and flat	
H. Modeling Techniques: Briefly describe any mod analyses. Provide additional attachments, if needed	
Modelled emissions equivalent to 1 lb/hr increase; I per TCEQ memo for sources < 10 m height	Fugitives modelled at 1 m, used 0.6 factor

Electronic Modeling Evaluation Workbook for SCREEN3
Flare Source Parameters

Company Name: \_\_Equistar

Date: \_10/10/2019

Permit #: \_\_2128

		Modeling	Easting:   Northing:   Height   Heat Release				
EPN	Model ID	Scenario X [m] Y [m]		[m]	(cal/s)	Description	
17E01	17E01 Routine 296		296237.00	3301999.00	68.58	5700315.61	EP Flare
25E01	25E01 Routine		295302.00	3302050.00	18.29	1224876.96	IPOH Flare
6E07			296021.00	3302011.00	38.10	2393262.01	Alky Flare

Electronic Modeling Evaluation Workbook for SCREEN3

Area Source Parameters

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

1						Modeled			
ı			Modeling	Easting:	Northing:	Release Height	Longer Side	Shorter Side	
ı	EPN	Model ID	Scenario	X [m]	Y [m]	[m]	Length X [m]	Length Y [m]	Area Source Size Justification
	F3E00	EP Fug	Routine	295755.00	3302070.00	1.00	101.27	94.85	Area of most impacted area

Electronic Modeling Evaluation Workbook for SCREEN3

Area Source Parameters

## Company Name: \_\_Equistar

Date: \_10/10/2019

Permit #: \_\_2128

EPN	Model ID	Area Source Release Height Justification	Source Description
F3E00	EP Fug	source at ground level	fugitive emission sources

Electronic Modeling Evaluation Workbook for SCREEN3

Point + Flare Emissions

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

EPN	Model ID	Modeling Scenario	Pollutant	Averaging Time	Standard Type	Review Context	Intermittent Source?	Modeled Emission Rate [lb/hr]
17E01	17E01	Routine	Generic	1-hr			No	1.00
	25E01		Generic	1-hr			No	1.00
	6E07		Generic	1-hr			No	1.00

Date: \_10/10/2019

Company Name: \_\_Equistar

Permit #: \_\_2128

**Electronic Modeling Evaluation Workbook for SCREEN3** 

## **Point + Flare Emissions**

EPN	Model ID	Basis of Emission Rate	Scalars or Factors Used?	Scalar/Factor in Use	Downwash Structure Considered	Distance to Ambient Air (m)
17E01	17E01	1 lb/hr	No			832.00
	25E01	1 lb/hr	No			829.00
	6E07	1 lb/hr	No		BLD1151	800.00

Electronic Modeling Evaluation Workbook for SCREEN3

Area Source Emissions

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

		Modeling					Intermittent	Modeled Emission
EPN	Model ID	Scenario	Pollutant	Averaging time	Standard Type	Review Context	Source?	Rate [lb/hr]
F3E00	EP Fug	Routine	Generic	1-hr			No	1.00

Electronic Modeling Evaluation Workbook for SCREEN3

Area Source Emissions

Permit #: \_\_2128 Company Name: \_\_Equistar

Date: \_10/10/2019

					Distance to
			Scalars or		Ambient Air
EPN	Model ID	Basis of Emission Rate	Factors Used?	Scalar/Factor in Use	(m)
F3E00	EP Fug	maximum	Yes	0.6 per TCEQ memo	554.00

# Electronic Modeling Evaluation Workbook for SCREEN3 Speciated Emissions

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

<b>Speciated Emissions</b>	by Model ID			
			Short-Term ESL	Long-Term ESL
CAS#	Chemical Species	Other Species	(µg/m³)	(µg/m³)
106-99-0	1,3-butadiene		510	9.9
16747-50-5	11-methyl-1-ethylcyclopentane		3500	350
560-21-4	2,3,3-trimethylpentane		5600	540
565-75-3	2,3,4-trimethylpentane		5600	540
589-43-5	2,4-dimethylhexane		5600	540
592-13-2	2,5-dimethylhexane		5600	540
106-97-8	n-butane		66000	7100
540-84-1	2,2,4-trimethylpentane		5600	540
78-78-4	isopentane		59000	7100
591-76-4	2-methylhexane		10000	2700
107-83-5	2-methylpentane		5600	200
111-84-2	n-nonane		4800	450
75-07-0	acetaldehyde		120	45
75-65-0	tert-butyl alcohol		620	62
115-11-7	isobutene		180000	32000
67-56-1	methanol		3900	2100
558-30-5 67-63-0	isobutylene oxide		60	6 492
78-93-3	isopropanol methyl ethyl ketone		4920 18000	2600
123-38-6	propionaldehyde		92	40
75-56-9	propionaldenyde propylene oxide		70	7
67-64-1	acetone		7800	4800
67-56-1	methanol		3900	2100
71-43-2	benzene		170	4.5
590-18-1	cis-2-butene		10000	480
74-98-6	propane		Simple Asphyxiant	Simple Asphyxiant
75-28-5	isobutane		23000	7100
624-64-6	trans-2-butene		10000	480
1634-04-4	methyl tert-butyl ether		630	180
79-20-9	methyl acetate		6000	600
589-34-4	3-methylhexane		10000	2700

# Electronic Modeling Evaluation Workbook for SCREEN3 Speciated Emissions

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

107-31-3	methyl formate	1200	120
75-05-8	acetonitrile	340	34
74-86-2	acetylene	26600	2660
590-19-2	1,2-butadiene	1100	9.9
106-98-9	1-butene	19000	1600
563-46-2	2-methyl-1-butene	290	480
513-35-9	2-methyl-2-butene	10000	480
563-45-1	3-methyl-1-butene	290	2200
627-20-3	cis-2-pentene	10000	480
542-92-7	cyclopentadiene	2000	200
287-92-3	cyclopentane	17000	1700
142-29-0	cyclopentene	3700	370
503-17-3	2-butyne	16400	1640
74-85-1	ethylene	1400	34
78-79-5	isoprene	130	120
463-82-1	neopentane	59000	7100
591-93-5	1,4-pentadiene	2000	200
109-66-0	n-pentane	59000	7100
109-67-1	1-pentene	290	480
1574-41-0	cis-piperylene	2000	200
115-07-1	propylene	Simple Asphyxiant	Simple Asphyxiant
108-88-3	toluene	4500	1200
100-40-3	4-vinylcyclohexene	510	97
534-15-6	methylacetaldehyde	450	45
75-83-2	2,2-dimethylbutane	5600	200
598-53-8	methyl isopropyl ether	2500	250
115-10-6	dimethyl ether	19000	1900
75-21-8	ethylene oxide	20	2
630-08-0	carbon monoxide	Must Meet NAAQS	Must Meet NAAQS
3710-84-7	N,N'-diethylhydroxylamine	400	40
98-29-3	tert-butyl catechol	20	2

Electronic Modeling Evaluation Workbook for SCREEN3

Combined Emissions

Date: \_10/10/2019 Permit #: \_\_2128

Company Name: \_\_Equistar

EPN	Model ID	Modeling scenario	Pollutant	Modeled Averaging time	Standard Type	Review Context	Intermittent	Source Type	Modeled Emission Rate [lb/hr]	Downwash Structure Considered
17E01	17E01	Routine	Generic	1-hr	NAAQS	SIL Analysis	No	Flare	1.00	
0	25E01	0	Generic	1-hr	NAAQS	SIL Analysis	No	Flare	1.00	
0	6E07	0	Generic	1-hr			No	Flare	1.00	BLD1151
F3E00	EP Fug	Routine	Generic	1-hr	Health Effects	Project-Wide	No	Area	1.00	

Electronic Modeling Evaluation Workbook for SCREEN3

Modeling Scenarios

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

Modeling Scenario	Scenario Description:
Routine	Flare at maximum heat release potential (not used for analysis since results in lower GLCmax)

Date: \_10/10/2019 Permit #: \_\_2128

Company Name: \_\_Equistar

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Table 1. Project-Related Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	-0.46000	14.3
H <sub>2</sub> SO <sub>4</sub>	1-hr		1
H <sub>2</sub> SO <sub>4</sub>	24-hr		0.3
H <sub>2</sub> S	1-hr		2.16 (If property is residential, recreational, business, or commercial)
H <sub>2</sub> S	1-hr		3.24 (If property is not residential, recreational, business, or commercial)

Table 2. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (μg/m³)	Standard (μg/m³)
SO <sub>2</sub>	1-hr		715
H <sub>2</sub> SO <sub>4</sub>	1-hr		50
H <sub>2</sub> SO <sub>4</sub>	24-hr		15
H <sub>2</sub> S	1-hr		108 (If property is residential, recreational, business, or commercial)
H <sub>2</sub> S	1-hr		162 (If property is not residential, recreational, business, or commercial)

Date: \_10/10/2019

Company Name: \_\_Equistar

Permit #: \_\_2128

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Table 3. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	-0.46000	7.8*
SO <sub>2</sub>	3-hr	-0.41000	25
SO <sub>2</sub>	24-hr	-0.18000	5
SO <sub>2</sub>	Annual	-0.04000	1
PM <sub>10</sub>	24-hr		5
NO <sub>2</sub>	1-hr	-3.79000	7.5**
NO <sub>2</sub>	Annual	-0.30000	1
CO	1-hr	-21.47000	2000
CO	8-hr	-15.30000	500

Additional information for the De Minimis values listed above can be found at:

<sup>\*</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/appwso2.pdf

<sup>\*\*</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/guidance 1hr no2naaqs.pdf

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

#### Table 4. PM<sub>2.5</sub> Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (μg/m³)	Secondary PM <sub>2.5</sub> Contribution (μg/m³)	Total Conc. = Secondary PM <sub>2.5</sub> + GLCmax (μg/m³)	De Minimis (μg/m³)
PM <sub>2.5</sub>	24-hr		0	0.0000	1.2*
PM <sub>2.5</sub>	Annual		0	0.00000	0.2*

Additional information for the De Minimis values listed above can be found at:

\* www.tceq.texas.gov/permitting/air/modeling/epa-mod-quidance.html

#### Table 5. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (μg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (μg/m³)	Standard (μg/m³)
SO <sub>2</sub>	1-hr		0	0	196
SO <sub>2</sub>	3-hr		0	0	1300
SO <sub>2</sub>	24-hr		0	0	365
SO <sub>2</sub>	Annual		0	0	80
PM <sub>10</sub>	24-hr		0	0	150
Pb	3-mo		0	0	0.15
NO <sub>2</sub>	1-hr		0	0	188
NO <sub>2</sub>	Annual		0	0	100
CO	1-hr		0	0	40000
CO	8-hr		0	0	10000

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

#### Table 6. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m³)	Secondary PM <sub>2.5</sub> Contribution (µg/m³)  Background (µg/m³)		Total Conc. = [Background + Secondary + GLCmax] (μg/m³)
PM <sub>2.5</sub>	24-hr		0	0	0
PM <sub>2.5</sub>	Annual		0	0	0

**Electronic Modeling Evaluation Workbook for SCREEN3** Company Name: \_\_Equistar **NAAQS-SPL Modeling Results** 

Date: \_10/10/2019

Permit #: \_\_2128

Standard (µg/m³)
35
12

Electronic Modeling Evaluation Workbook for SCREEN3
Unit Impact Multipliers

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

EPN	Model ID	Modeling Scenario	1-hr GLCmax (μg/m³ per lb/hr)	3-hr GLCmax (µg/m³ per lb/hr)	8-hr GLCmax (µg/m³ per lb/hr)	24-hr GLCmax (µg/m³ per lb/hr)	Annual GLCmax (μg/m³ per lb/hr)
17E01	17E01	Routine	2.67E-01	0.24057	0.18711	0.10692	0.021384
	25E01		8.53E-01	0.76797	0.59731	0.34132	0.068264
	6E07		6.02E-01	0.54216	0.42168	0.24096	0.048192
F3E00	EP Fug	Routine	74.5164	67.06476	52.16148	29.80656	5.961312

# Electronic Modeling Evaluation Workbook for SCREEN3 Health Effect Modeling Results

Permit #: \_\_2128
Company Name: \_\_Equistar

Date: \_10/10/2019

Modeled Healt	Step 3			
			- 3-	10% ESL Step 3 Modeled GLCma
Chemical Species		Averaging Time	ESL [µg/m³]	[µg/m³]
1,3-butadiene	106-99-0	1-hr	510	6.13
11-methyl-1-ethylcyclopentane	16747-50-5	1-hr	3500	0.00
2,3,3-trimethylpentane	560-21-4	1-hr	5600	-0.15
2,3,4-trimethylpentane	565-75-3	1-hr	5600	-0.12
2,4-dimethylhexane	589-43-5	1-hr	5600	0.00
2,5-dimethylhexane	592-13-2	1-hr	5600	0.00
n-butane	106-97-8	1-hr	66000	5.64
2,2,4-trimethylpentane	540-84-1	1-hr	5600	0.00
isopentane	78-78-4	1-hr	59000	-0.50
2-methylhexane	591-76-4	1-hr	10000	0.00
2-methylpentane	107-83-5	1-hr	5600	0.00
n-nonane	111-84-2	1-hr	4800	0.00
acetaldehyde	75-07-0	1-hr	120	-0.26
tert-butyl alcohol	75-65-0	1-hr	620	0.00
isobutene	115-11-7	1-hr	180000	5.67
methanol	67-56-1	1-hr	3900	-5.50
isobutylene oxide	558-30-5	1-hr	60	-5.10
isopropanol	67-63-0	1-hr	4920	-1.53
methyl ethyl ketone	78-93-3	1-hr	18000	0.00
propionaldehyde	123-38-6	1-hr	92	-0.02
propylene oxide	75-56-9	1-hr	70	-1.41
acetone	67-64-1	1-hr	7800	-5.88
methanol	67-56-1	1-hr	3900	-5.50
benzene	71-43-2	1-hr	170	-0.12
cis-2-butene	590-18-1	1-hr	10000	5.86
propane	74-98-6	1-hr	Simple Asphyxiant	-0.89
isobutane	75-28-5	1-hr	23000	-8.38
trans-2-butene	624-64-6	1-hr	10000	10.16
methyl tert-butyl ether	1634-04-4	1-hr	630	-0.46
methyl acetate	79-20-9	1-hr	6000	-0.51
3-methylhexane	589-34-4	1-hr	10000	-0.32
methyl formate	107-31-3	1-hr	1200	-0.17
acetonitrile	75-05-8	1-hr	340	0.00
acetylene	74-86-2	1-hr	26600	-0.07
1,2-butadiene	590-19-2	1-hr	1100	10.43
1-butene	106-98-9	1-hr	19000	10.43
2-methyl-1-butene	563-46-2	1-hr	290	-0.02

Date: \_10/10/2019 Permit #: \_\_2128

Company Name: \_\_Equistar

	Evaluation Workboo	
ance):	Step 3	

Modeled Health	Modeled Health Effect Results (MERA Guidance):								
Chemical Species	CAS Number	Averaging Time	ESL [μg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]					
2-methyl-2-butene	513-35-9	1-hr	10000	0.00					
3-methyl-1-butene	563-45-1	1-hr	290	-0.03					
cis-2-pentene	627-20-3	1-hr	10000	-0.10					
cyclopentadiene	542-92-7	1-hr	2000	0.00					
cyclopentane	287-92-3	1-hr	17000	-0.05					
cyclopentene	142-29-0	1-hr	3700	-0.04					
2-butyne	503-17-3	1-hr	16400	0.00					
ethylene	74-85-1	1-hr	1400	-0.01					
isoprene	78-79-5	1-hr	130	0.00					
neopentane	463-82-1	1-hr	59000	-0.04					
1,4-pentadiene	591-93-5	1-hr	2000	-0.03					
n-pentane	109-66-0	1-hr	59000	-0.08					

### **Electronic Modeling Evaluation Workbook for SCREEN3 Health Effect Modeling Results**

Modeled Health	Modeled Health Effect Results (MERA Guidance): Step 3								
				10% ESL Step 3 Modeled GLCmax					
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	[µg/m³]					
1-pentene	109-67-1	1-hr	290	-0.04					
cis-piperylene	1574-41-0	1-hr	2000	-0.02					
propylene	115-07-1	1-hr	Simple Asphyxiant	-0.05					
toluene	108-88-3	1-hr	4500	-0.06					
4-vinylcyclohexene	100-40-3	1-hr	510	-0.01					
methylacetaldehyde	534-15-6	1-hr	450	-0.33					
2,2-dimethylbutane	75-83-2	1-hr	5600	-0.04					
methyl isopropyl ether	598-53-8	1-hr	2500	-0.17					
dimethyl ether	115-10-6	1-hr	19000	-0.07					
ethylene oxide	75-21-8	1-hr	20	-0.01					
N,N'-diethylhydroxylamine	3710-84-7	1-hr	400	3.67					
tert-butyl catechol	98-29-3	1-hr	20	0.63					
1,3-butadiene	106-99-0	Annual	9.9	0.61					
11-methyl-1-ethylcyclopentane	16747-50-5	Annual	350	0.00					
2,3,3-trimethylpentane	560-21-4	Annual	540	0.00					
2,3,4-trimethylpentane	565-75-3	Annual	540	0.00					
2,4-dimethylhexane	589-43-5	Annual	540	0.00					
2,5-dimethylhexane	592-13-2	Annual	540	0.00					
n-butane	106-97-8	Annual	7100	0.69					
2,2,4-trimethylpentane	540-84-1	Annual	540	0.00					
isopentane	78-78-4	Annual	7100	0.00					
2-methylhexane	591-76-4	Annual	2700	0.00					
2-methylpentane	107-83-5	Annual	200	0.00					
n-nonane	111-84-2	Annual	450	0.00					
acetaldehyde	75-07-0	Annual	45	-0.01					
tert-butyl alcohol	75-65-0	Annual	62	0.00					
isobutene	115-11-7	Annual	32000	0.56					
methanol	67-56-1	Annual	2100	-0.06					
isobutylene oxide	558-30-5	Annual	6	-0.11					
isopropanol	67-63-0	Annual	492	-0.03					
methyl ethyl ketone	78-93-3	Annual	2600	0.00					
propionaldehyde	123-38-6	Annual	40	0.00					
propylene oxide	75-56-9	Annual	7	-0.04					
acetone	67-64-1	Annual	4800	-0.07					
methanol	67-56-1	Annual	2100	-0.06					
benzene	71-43-2	Annual	4.5	0.00					
cis-2-butene	590-18-1	Annual	480	0.82					
propane	74-98-6	Annual	Simple Asphyxiant	-0.02					
isobutane	75-28-5	Annual	7100	0.43					
trans-2-butene	624-64-6	Annual	480	0.43					
trans-z-buterie	027-07-0	L	100	0.02					

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Effect Results	(MERA Guidance	):	Step 3
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]
methyl tert-butyl ether	1634-04-4	Annual	180	-0.01
methyl acetate	79-20-9	Annual	600	-0.01
3-methylhexane	589-34-4	Annual	2700	0.00
methyl formate	107-31-3	Annual	120	0.00
acetonitrile	75-05-8	Annual	34	0.00
acetylene	74-86-2	Annual	2660	0.00
1,2-butadiene	590-19-2	Annual	9.9	0.82
1-butene	106-98-9	Annual	1600	0.82
2-methyl-1-butene	563-46-2	Annual	480	0.00
2-methyl-2-butene	513-35-9	Annual	480	0.00
3-methyl-1-butene	563-45-1	Annual	2200	0.00
cis-2-pentene	627-20-3	Annual	480	0.00
cyclopentadiene	542-92-7	Annual	200	0.00
cyclopentane	287-92-3	Annual	1700	0.00
cyclopentene	142-29-0	Annual	370	0.00
2-butyne	503-17-3	Annual	1640	0.00
ethylene	74-85-1	Annual	34	0.00

Company Name: \_\_Equistar

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Modeled Health	Modeled Health Effect Results (MERA Guidance): Step 3									
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]						
isoprene	78-79-5	Annual	120	0.00						
neopentane	463-82-1	Annual	7100	0.00						
1,4-pentadiene	591-93-5	Annual	200	0.00						
n-pentane	109-66-0	Annual	7100	0.00						
1-pentene	109-67-1	Annual	480	0.00						
cis-piperylene	1574-41-0	Annual	200	0.00						
propylene	115-07-1	Annual	Simple Asphyxiant	0.00						
toluene	108-88-3	Annual	1200	0.00						
4-vinylcyclohexene	100-40-3	Annual	97	0.00						
methylacetaldehyde	534-15-6	Annual	45	0.00						
2,2-dimethylbutane	75-83-2	Annual	200	0.00						
methyl isopropyl ether	598-53-8	Annual	250	0.00						
dimethyl ether	115-10-6	Annual	1900	0.00						
ethylene oxide	75-21-8	Annual	2	0.00						
N,N'-diethylhydroxylamine	3710-84-7	Annual	40	0.29						
tert-butyl catechol	98-29-3	Annual	2	0.05						

Electronic Modeling Evaluation Workbook for SCREEN3

Modeling File Names

Date: \_10/10/2019 Permit #: \_\_2128 Company Name: \_\_Equistar

Model File Base Name	Pollutant	Averaging Time	File Extensions	Additional File Description
Area	generic	1-hr	.s3i	fugitives
Alky Flare DW	generic	1-hr	.s3i	Alky Flare
IPOH	generic	1-hr	.s3i	IPOH Flare
East Plant	generic	1-hr	.s3i	East Plant Flare

EPN	Model ID	GLCmax @	1 lb/hr
		ug/m3	
17E01	17E01	0.267	0.2673 max beyond property line
25E01	25E01	0.853	0.8533 used GLC at property line 924 m
6E07	6E07	0.602	0.6024 used value at property line 1092 m with lowest GLC to be conservative (max
F3E00	EP Fug	124.194	74.5164 emissions modelled at 1 m, applied factor for sources < 10 m per TCEQ guida

### **Emissions Increase**

EPN		17E01	17E01	17E01	6E07	25E01	F3E00	GLCmax	ESL	< 10%
		Project Increase	PBR incorpora tion	Sta	ındard Perr	nit	PBR incorpora tion			ESL
		lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	ug/m3	ug/m3	
NOx		4.99	1.05	14.08	-9.66	-4.42		-4.211		
со		25.45	5.36	71.77	-49.25	-22.52		-21.466		
SO2		2.29		3.18	-3.17	-0.01		-0.455		
1,3-butadiene	106-99-0		0.19	2.37	-0.07	-2.30	0.10	6.133	510	Yes
11-methyl-1-ethylcyclopentane	16747-50-	5	0.00					0.000	3500	Yes
2,3,3-trimethylpentane	560-21-4		0.00	0.26		-0.26		-0.149	5600	Yes
2,3,4-trimethylpentane	565-75-3		0.00	0.21		-0.21		-0.120	5600	Yes
2,4-dimethylhexane	589-43-5		0.00					0.000	5600	Yes
2,5-dimethylhexane	592-13-2		0.00					0.000	5600	Yes
n-butane	106-97-8		0.13	12.79	-10.61	-2.18	0.14	5.636	66000	Yes
2,2,4-trimethylpentane	540-84-1		0.01					0.003	5600	Yes
isopentane	78-78-4		0.03	1.31	-1.02	-0.29		-0.502	59000	Yes
2-methylhexane	591-76-4		0.00					0.001	10000	Yes
2-methylpentane	107-83-5		0.01					0.002	5600	Yes
n-nonane	111-84-2		0.01					0.001	4800	Yes
acetaldehyde	75-07-0		0.04	0.47		-0.47		-0.264	120	Yes
tert-butyl alcohol	75-65-0		0.01					0.002	620	Yes
isobutene	115-11-7		0.67	8.50	-0.14	-8.36	0.14	5.667	180000	Yes
methanol	67-56-1		0.53	9.62		-9.62		-5.497	3900	Yes
isobutylene oxide	558-30-5		0.70	9.02		-9.02		-5.097	60	Yes

EPN		17E01	17E01	17E01	6E07	25E01	F3E00	GLCmax	ESL	< 10%
isopropanol	67-63-0		0.17	2.69		-2.69		-1.532	4920	Yes
methyl ethyl ketone	78-93-3		0.01					0.002	18000	Yes
propionaldehyde	123-38-6		0.02	0.05		-0.05		-0.022	92	Yes
propylene oxide	75-56-9		0.33	2.56		-2.56		-1.414	70	Yes
acetone	67-64-1		0.18	10.12		-10.12		-5.885	7800	Yes
methanol	67-56-1		0.53	9.62		-9.62		-5.497	3900	Yes
benzene	71-43-2		0.04	0.39	-0.39			-0.122	170	Yes
cis-2-butene	590-18-1		0.47	8.04	-0.06	-7.98	0.14	5.863	10000	Yes
propane	74-98-6	0.40	0.05	2.35	-1.45	-0.89		-0.891	ple Asphyx	N/A
isobutane	75-28-5		0.03	55.59	-54.82	-0.77	0.14	-8.383	23000	Yes
trans-2-butene	624-64-6		0.02	0.50	-0.08	-0.42	0.14	10.164	10000	Yes
methyl tert-butyl ether	1634-04-4		0.02	0.79		-0.79		-0.456	630	Yes
methyl acetate	79-20-9		0.01	0.88		-0.88		-0.513	6000	Yes
3-methylhexane	589-34-4		0.01	0.56		-0.56		-0.323	10000	Yes
methyl formate	107-31-3		0.01	0.29		-0.29		-0.166	1200	Yes
acetonitrile	75-05-8			0.01	-0.01			-0.003	340	Yes
acetylene	74-86-2			0.20	-0.20			-0.066	26600	Yes
1,2-butadiene	590-19-2			0.01	-0.01		0.14	10.429	1100	Yes
1-butene	106-98-9			0.01	-0.01		0.14	10.430	19000	Yes
2-methyl-1-butene	563-46-2			0.06	-0.06			-0.019	290	Yes
2-methyl-2-butene	513-35-9			0.00	0.00			-0.001	10000	Yes
3-methyl-1-butene	563-45-1			0.08	-0.08			-0.028	290	Yes
cis-2-pentene	627-20-3			0.30	-0.30			-0.100	10000	Yes
cyclopentadiene	542-92-7			0.01	-0.01			-0.004	2000	Yes
cyclopentane	287-92-3			0.15	-0.15			-0.052	17000	Yes
cyclopentene	142-29-0			0.12	-0.12			-0.041	3700	Yes
2-butyne	503-17-3			0.01	-0.01			-0.002	16400	Yes
ethylene	74-85-1			0.03	-0.03			-0.009	1400	Yes
isoprene	78-79-5			0.01	-0.01			-0.004	130	Yes
neopentane	463-82-1			0.08	-0.03	-0.05		-0.040	59000	Yes
1,4-pentadiene	591-93-5			0.10	-0.10			-0.034	2000	Yes
n-pentane	109-66-0			0.22	-0.19	-0.02		-0.078	59000	Yes
1-pentene	109-67-1			0.07	-0.01	-0.06		-0.039	290	Yes

EPN		17E01	17E01	17E01	6E07	25E01	F3E00	GLCmax	ESL	< 10%
cis-piperylene	1574-41-0			0.07	-0.07			-0.023	2000	Yes
propylene	115-07-1			0.09	0.00	-0.09		-0.051	ple Asphyx	N/A
toluene	108-88-3			0.17	-0.17			-0.056	4500	Yes
4-vinylcyclohexene	100-40-3			0.02	-0.02			-0.005	510	Yes
methylacetaldehyde	534-15-6			0.56		-0.56		-0.326	450	Yes
2,2-dimethylbutane	75-83-2			0.07		-0.07		-0.039	5600	Yes
methyl isopropyl ether	598-53-8			0.29		-0.29		-0.169	2500	Yes
dimethyl ether	115-10-6			0.12		-0.12		-0.070	19000	Yes
ethylene oxide	75-21-8			0.02		-0.02		-0.014	20	Yes
N,N'-diethylhydroxylamine	3710-84-7						0.05	3.668	400	Yes
tert-butyl catechol	98-29-3						0.01	0.626	20	Yes

	1-	hr	3-	hr	8-	hr	24	-hr	Ann	ıual
	multiplier	ug/m3	multiplier	ug/m3	multiplier	ug/m3	multiplier	ug/m3	multiplier	ug/m3
NO2	0.9	-3.79							0.08	-0.30
СО	1	-21.47			0.7	-15.03			0.08	-1.72
SO2	1	-0.46	0.9	-0.41			0.4	-0.18	0.08	-0.04

EPN

17E01 25E01

6E07 occurs beyond property line)

F3E00 ance

# Emissions Increase

multiplier 0.08

EPN	17E01	17E01	17E01	6E07	25E01	F3E00	GLCmax	.Cmax annı	ESL	< 10%
	Project Increase	PBR incorpora tion	Sta	ndard Perr	nit	PBR incorpora tion				ESL
	tpy	tpy	tpy	tpy	tpy	tpy	ug/m3	ug/m3	ug/m3	
NOx	9.11	0.31	12.79	-7.37	-5.42		-0.714	-0.0571		
СО	46.44	1.55	65.16	-37.54	-27.62		-3.639	-0.2911		
SO2	3.37		4.85	-4.83	-0.02		-0.167	-0.0133		
1,3-butadiene		0.24	0.03	-0.02	-0.02	0.45	7.667	0.6134	9.9	Yes
11-methyl-1-ethylcyclopentane		0.00					0.000	0.0000	350	Yes
2,3,3-trimethylpentane		0.00	0.16		-0.16		-0.021	-0.0017	540	Yes
2,3,4-trimethylpentane		0.00	0.13		-0.13		-0.017	-0.0014	540	Yes
2,4-dimethylhexane		0.00					0.000	0.0000	540	Yes
2,5-dimethylhexane		0.00					0.000	0.0000	540	Yes
n-butane		0.08	18.60	-15.26	-3.34	0.60	8.598	0.6878	7100	Yes
2,2,4-trimethylpentane		0.00					0.000	0.0000	540	Yes
isopentane		0.01	0.19		-0.19		-0.025	-0.0020	7100	Yes
2-methylhexane		0.00					0.000	0.0000	2700	Yes
2-methylpentane		0.00					0.000	0.0000	200	Yes
n-nonane		0.00					0.000	0.0000	450	Yes
acetaldehyde		0.02	0.66		-0.66		-0.087	-0.0070	45	Yes
tert-butyl alcohol		0.00					0.000	0.0000	62	Yes
isobutene		0.58	24.46	-0.04	-24.42	0.60	6.973	0.5579	32000	Yes
methanol		0.10	5.98		-5.98		-0.794	-0.0635	2100	Yes
isobutylene oxide		0.26	10.49		-10.49		-1.387	-0.1110	6	Yes

EPN	17E01	17E01	17E01	6E07	25E01	F3E00	GLCmax	Cmax annı	ESL	< 10%
isopropanol		0.07	3.13		-3.13		-0.414	-0.0331	492	Yes
methyl ethyl ketone		0.00					0.000	0.0000	2600	Yes
propionaldehyde		0.00	0.05		-0.05		-0.007	-0.0005	40	Yes
propylene oxide		0.10	3.44		-3.44		-0.454	-0.0364	7	Yes
acetone		0.08	6.29		-6.29		-0.837	-0.0670	4800	Yes
methanol		0.10	5.98		-5.98		-0.794	-0.0635	2100	Yes
benzene		0.02	0.08	-0.08			-0.005	-0.0004	4.5	Yes
cis-2-butene		0.00	0.03	-0.02	-0.01	0.60	10.204	0.8164	480	Yes
propane	0.72	0.00	3.29	-3.11	-0.18		-0.218	-0.0174	ple Asphyx	N/A
isobutane		0.00	62.60	-62.48	-0.12	0.60	5.412	0.4330	7100	Yes
trans-2-butene		0.00	0.03	-0.03	0.00	0.60	10.205	0.8164	480	Yes
methyl tert-butyl ether		0.01	0.49		-0.49		-0.065	-0.0052	180	Yes
methyl acetate		0.01	0.55		-0.55		-0.073	-0.0058	600	Yes
3-methylhexane		0.01	0.35		-0.35		-0.046	-0.0037	2700	Yes
methyl formate		0.01	0.23		-0.23		-0.031	-0.0024	120	Yes
acetonitrile			0.02	-0.02			-0.001	-0.0001	34	Yes
acetylene			0.01	-0.01			-0.001	-0.0001	2660	Yes
1,2-butadiene			0.01	-0.01		0.60	10.207	0.8166	9.9	Yes
1-butene			0.01	-0.01		0.60	10.207	0.8166	1600	Yes
2-methyl-1-butene			0.03	-0.03			-0.002	-0.0002	480	Yes
2-methyl-2-butene			0.01	-0.01			-0.001	-0.0001	480	Yes
3-methyl-1-butene			0.03	-0.03			-0.002	-0.0002	2200	Yes
cis-2-pentene			0.08	-0.08			-0.006	-0.0005	480	Yes
cyclopentadiene			0.01	-0.01			-0.001	-0.0001	200	Yes
cyclopentane			0.30	-0.30			-0.023	-0.0018	1700	Yes
cyclopentene			0.11	-0.11			-0.009	-0.0007	370	Yes
2-butyne			0.01	-0.01			-0.001	-0.0001	1640	Yes
ethylene			0.01	-0.01			-0.001	0.0000	34	Yes
isoprene			0.02	-0.02			-0.001	-0.0001	120	Yes
neopentane			0.12	-0.06	-0.06		-0.012	-0.0010	7100	Yes
1,4-pentadiene			0.05	-0.05			-0.004	-0.0003	200	Yes
n-pentane			0.25	-0.24	-0.02		-0.020	-0.0016	7100	Yes
1-pentene			0.07	-0.01	-0.06		-0.009	-0.0007	480	Yes

EPN	17E01	17E01	17E01	6E07	25E01	F3E00	GLCmax	Cmax ann	ESL	< 10%
cis-piperylene			0.10	-0.10			-0.007	-0.0006	200	Yes
propylene			0.03	-0.01	-0.02		-0.004	-0.0003	ple Asphyx	N/A
toluene			0.26	-0.26			-0.020	-0.0016	1200	Yes
4-vinylcyclohexene			0.02	-0.02			-0.001	-0.0001	97	Yes
methylacetaldehyde			0.35		-0.35		-0.046	-0.0037	45	Yes
2,2-dimethylbutane			0.04		-0.04		-0.005	-0.0004	200	Yes
methyl isopropyl ether			0.18		-0.18		-0.024	-0.0019	250	Yes
dimethyl ether			0.14		-0.14		-0.019	-0.0015	1900	Yes
ethylene oxide			0.01		-0.01		-0.002	-0.0002	2	Yes
N,N'-diethylhydroxylamine						0.22	3.668	0.2935	40	Yes
tert-butyl catechol						0.04	0.626	0.0501	2	Yes

NO2	
СО	
SO2	

# **Preliminary Determination Summary**

Equistar Chemicals, LP Permit Numbers 2933 and N140M1

# I. Applicant

Equistar Chemicals LP PO Box 777 Channelview, TX 77530-0777

# II. Project Location

Channelview Complex 8280 Sheldon Rd Harris County Channelview, Texas 77530

## **III.** Project Description

Lyondell submitted an amendment to modify the operation of the existing flare to meet future regulatory requirements. Additional natural gas is required to meet the anticipated operating limit to maintain a net heating value of the flare combustion zone gas (NHVcz) at or above 270 Btu/scf. The site anticipates future requirements for the combustion zone that match the limits currently identified in 40 CFR 63 Subpart CC. No changes to the operation of the process unit or process vent controlled by the flare are being made with this project. All increases of VOC emissions will result from the minimal non-methane and non-ethane organics present in the imported natural gas supply. Additionally, the application identifies the SO<sub>2</sub> increases resulting from the minimal sulfur present in the natural gas. No increases in emissions from maintenance, startup, and shutdown (MSS) activities are included in this project.

# IV. Project Emissions

Air Contaminant	Proposed Allowable Emission Rates (tpy)
VOC	742.28
NOx	2276.91
SO <sub>2</sub>	150.85
CO	2240.26

# V. Federal Applicability

The following chart illustrates the annual project emissions for each pollutant and whether this pollutant triggers PSD or Nonattainment (NA) review.

Page 2

Pollutant	Project Emissions (tpy)	Major Mod Trigger (tpy)	NA Triggered Y/N	PSD Triggered Y/N
voc	2.16	25 for NA 40 for PSD	N	N
NOx	5.73	25 for NA 40 for PSD	Y	N
SO <sub>2</sub>	2.81	40	N	N
СО	29.49	100	N	N

The site is located in Harris County, which has been designated as a serious nonattainment area for ozone. The Channelview Complex is an existing major source of VOC and  $NO_X$ , and the project will result in a significant net increase of  $NO_X$ .

The Channelview Facility is a named source. The site is located in an attainment area for at least one pollutant, and is an existing major stationary source. The project emission increases are below the applicable significant significance threshold in 40 CFR § 52.21(b)(23)(i) for VOC, SO<sub>2</sub>, and CO. PSD BACT and air quality analysis (AQA) requirements do not apply.

Pollutant	Project Increase (tpy) <sup>1</sup>	NA Netting Trigger (tpy)	PSD Netting Trigger (tpy)	Netting Required Y/N	Net Emission Change (tpy) <sup>2</sup>	Major Mod Trigger (tpy)	PSD Triggered Y/N	NA Triggered Y/N
VOC <sup>3</sup>	2.16	5	40	N	N/A	25	N	N
NOx <sup>3, 4</sup>	5.73	5	40	Υ	105.43	25	N	Υ
SO <sub>2</sub> <sup>4</sup>	2.81	N/A	40	N	N/A	40	N	N
СО	29.49	N/A	100	N	N/A	100	N	N

- Project Increases: Comparison of Baseline Actual to PTE (or Projected Actual) Increases only
- Net Emissions: Baseline Actual to PTE (or Projected Actual) for the project currently under review, Baseline Actual to PTE for all other increases and decreases within netting window.
- Ozone precursor. Either pollutant precursor can trigger BACT/LAER and impacts analysis, as applicable.

Page 3

PM<sub>2.5</sub> precursor. Not used to trigger PM<sub>2.5</sub> BACT/LAER or impacts analysis at this time.

# VI. Control Technology Review

A control technology review is required for all new and modified sources. The following controls required by the permits satisfy LAER for emissions of  $NO_X$ , based on a review of recently issued permits from Texas and other states, and consideration of RACT/BACT/LAER Clearinghouse (RBLC) data provided by the applicant.

## <u>Flare</u>

The flare is designed to meet the requirements of 40 CFR Part 60.18 and to achieve a VOC compound destruction efficiency of 99% for compounds with up to three carbons, and 98% for compounds with four or more carbon atoms. The flare is equipped with a continuous flow monitor and composition analyzer.

# VII. Air Quality Analysis

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

## A. Minor Source NSR and Air Toxics Review

Table 1. Project-Related Modeling Results for State Property Line

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	0.00488	14.3

**Table 2. Modeling Results for Minor NSR De Minimis** 

Pollutant	Averaging Time		
SO <sub>2</sub>	1-hr	0.00488	7.8
SO <sub>2</sub>	3-hr	0.00439	25
SO <sub>2</sub>	24-hr	0.00195	5
SO <sub>2</sub>	Annual	0.00363	1
NO <sub>2</sub>	1-hr	0.47	7.5

Page 4

Pollutant	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	De Minimis (μg/m³)	
NO <sub>2</sub>	Annual	0.013	1	
СО	1-hr	2.69	2,000	
СО	8-hr	1.88	500	

The GLC<sub>max</sub> are the maximum predicted concentration associated with one year of meteorological data.

The justification for selecting the EPA's interim 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> De Minimis levels was based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> De Minimis levels. As explained in EPA guidance memoranda<sup>1,2</sup>, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> and 1-hr SO<sub>2</sub> NAAQS.

# VIII. Offsets

The site is located in Harris County, which has been designated as a serious nonattainment area for ozone. The Channelview Facility is an existing major source of VOC and NO<sub>X</sub>, and the project will result in a significant net increase of NO<sub>X</sub>.

When issued, the permit requires that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H.

The permit holder shall use 7.3 tpy of  $NO_X$  credits to offset the 6.9 tpy  $NO_X$  project emissions increase for the facilities authorized by this permit at a ratio of 1.2 to 1.0.

Prior to the commencement of operation, the permit holder is required to obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits

www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf

www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

Page 5

Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.

# IX. Alternative Site Analysis and Compliance Certification

The applicant has submitted the required demonstration relating to consideration of alternative sites and Clean Air Act compliance status for sites owned or operated by the applicant (or by any entity controlling, controlled by, or under common control with the applicant). The analysis demonstrated that the benefits of the proposed location and source configuration significantly outweigh the environmental and social costs of that location.

## X. Conclusion

As described above, the applicant has demonstrated that the project meets all applicable rules, regulations and requirements of the Texas and Federal Clean Air Acts. The Executive Director's preliminary determination is that the permits should be issued.

### **Special Conditions**

#### Permit Numbers 2933, PSDTX1270, and N140M1

- 1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources Maximum Allowable Emission Rates" (MAERT), and those sources are limited to the emission limits and other conditions specified in that table.
- 2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing Volatile Organic Compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the maximum allowable emission rates table. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions with the exception of safety valves listed below and those that discharge directly to the atmosphere as a result of fire or failure of utilities.

PSV Number	Service	Set	Operating Pressure (psig)
49021	TK-4901 Suction Line	180	25
48036	TK-4901 Feed Line	180	50
49001	P-4901A/B Discharge	180	30
49022	TK-4904 Suction Line	180	25
49017	P-4903A/B Discharge	275	138
49016	TK-4902 Suction Line	50	25
48037	TK-4092 Feed Line	180	50
48012	TK-4903 Feed Line	180	50
49017	TK-4903 Suction Line	50	25
49003	P-4902A/B/C Discharge	180	47
49051	P-4902A Discharge to 16" PL	150	47
39568	P-4902B Suction (Dock)	225	150
49036	P-4902C Suction Line	180	25
49018	TK-4907 Suction Line	180	25
49519	P-4928A/B Discharge (Minimum Flow)	180	140
49514	P-4928A/B Discharge	180	140
49515	P-4928A/B Discharge	180	140
49516	P-4928A/B Discharge	180	140
49517	P-4928A/B Discharge	180	140
48016	1st Feed System	275	160
48035	3rd Feed System	720	275
49023	2nd Feed System	275	150
49513	PGO	180	20

## **Federal Applicability**

- 3. These facilities shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):
  - A. Subpart A, General Provisions.
  - B. Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators

- C. Subpart K, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.
- D. Subpart Ka, Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.
- E. Subpart Kb, Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.
- F. Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006.
- G. Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 4. These facilities shall comply with all requirements of the U.S. EPA regulations on National Emission Standards for Hazardous Air Pollutants promulgated in 40 CFR Part 61, as applicable, for:
  - A. Subpart A, General Provisions.
  - B. Subpart J, Equipment Leaks (Fugitive Emission Sources) of Benzene
  - C. Subpart V, Equipment Leaks (Fugitive Emission Sources)
  - D. Subpart Y, Benzene Emission From Benzene Storage Vessels
  - E. Subpart FF, Benzene Waste Operations
- These facilities shall comply with all applicable requirements of the U.S. EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63:
  - A. Subpart A, General Provisions.
  - B. 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
  - C. Subpart YY, Generic Maximum Achievable Control Technology Standards.
  - D. Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
  - E. Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

#### **Emission Standards and Operating Specifications**

- 6. Tanks are approved to store the liquids on the Approved Product List represented in Attachment A.
- 7. Storage tanks are subject to the following requirements: The control requirements specified in parts A-C of this condition shall not apply (1) where the VOC has an aggregate partial pressure of less than 0.50 psia at the maximum feed temperature or 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.

- A. The tank emissions must be controlled as specified in one of the paragraphs below:
  - (1) An internal floating deck or "roof" shall be installed. A domed external floating roof tank is equivalent to an internal floating roof tank. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal.
  - (2) An open-top tank shall contain a floating roof (external floating roof tank) which uses double seal or secondary seal technology provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weathershield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.
- B. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and any seal gap measurements specified in Title 40 Code of Federal Regulations § 60.113b (40 CFR § 60.113b) Testing and Procedures (as amended at 54 FR 32973, Aug. 11, 1989) to verify fitting and seal integrity. Records shall be maintained of the dates inspection was performed, any measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies noted.
- C. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998 except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.
- D. Except for labels, logos, etc. not to exceed 15 percent of the tank total surface area, uninsulated tank exterior surfaces exposed to the sun shall be white or unpainted aluminum. Storage tanks must be equipped with permanent submerged fill pipes.
- E. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12-month period. The record shall include tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, VOC throughput for the previous month and year-to-date. Records of VOC monthly average temperature are not required to be kept for unheated tanks which receive liquids that are at or below ambient temperatures.

Emissions from tanks shall be calculated using the methods that were used to determine the MAERT limits in the permit application dated December 5, 2016. Sample calculations from the application shall be attached to a copy of this permit at the plant site.

- 8. Tanks less than 1,000 gallons or containing a mixture of VOCs having a partial vapor pressures less than 0.5 psia or containing only non-VOCs are exempt from the requirements in Special Condition No. 7.D.
- 9. Atmospheric relief valves in VOC service that are not equipped with rupture disks shall be checked for leaks on a quarterly basis with an approved gas analyzer. A leak shall be defined as 500 parts per million by volume (ppmv). There shall be no variance for inaccessible valves. All leaking valves shall be repaired or replaced at the earliest opportunity but not later than the next scheduled process shutdown.

- 10. Analyzer sample system vents or speed loops shall be equipped with vapor recovery or liquid recovery systems (vapor samples routed to flare system or liquids samples route back to process). Analyzer (gas chromatographs) vapor sample loops shall depressure to atmospheric pressure during sample injection only and shall be routed to the flare during periods when sample is not being injected.
- 11. Cracking heaters, and heaters associated with the Olefin II and Flex/Isom Units shall not exceed the following firing rates:

EPN 44HTHTR, EPN EF4419	5,275
Pyrolysis/Steam Production Service	MMBtu/hr
EPN 44HTHTR	(combined
*Cracking Heaters:	total)*
(F-4401, F-4402, F-4403, F-4404, F-4405, F-4406, F-4407, F-4408, F-	
4409, F-4410, F-4411, F-4412, F-4413, F-4414, F-4415)	
*Ethane Heater (F4418):	
*Superheaters (F48001A/B)	
Regeneration Heater (F4601):	25 MMBtu/hr
Flex Regeneration Heater I (F4351):	13 MMBtu/hr
Flex Regeneration Heater II (F4361):	4.1 MMBtu/hr
Flexibility DP Heater I (F4360):	16 MMBtu/hr
Flexibility DP Heater II (F4360C):	16 MMBtu/hr
EPN EF4419	640 MMBtu/hr
*Cracking Heater: (F-4419)	

The heating value of the fuel (Btu/scf) and the fuel flow rate shall be continuously monitored for the cracking heaters, ethane heater, and steam superheaters. Compliance with air contaminant emission limits shall be based upon the above firing rate. Quality-assured (or valid) data must be generated when the fired unit is operating. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the fired unit operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded. Compliance with air contaminant emission limits shall be based upon the above firing rate.

- 12. Concentrations of NH<sub>3</sub> from the Cracking Heater Stack (Emission Point Nos. EPN 44HTHTRS, EPN EF 4419) shall not exceed 10 ppmvd on an hourly basis when corrected to three percent oxygen (O<sub>2</sub>). The NH<sub>3</sub> concentration shall be tested or calculated according to one of the three methods listed below:
  - A. The holder of this permit may install, calibrate, maintain, and operate a CEMS to measure and record the concentrations of NH<sub>3</sub>. The NH<sub>3</sub> concentrations shall be corrected and reported in accordance with Special Condition No. 23.
  - B. If a sorbent tube device specific for NH<sub>3</sub> is used, the frequency of the sorbent tube testing shall be daily for the first 60 days of SCR operation, after which, the frequency of the sorbent tube testing may be reduced from daily to weekly after operating procedures have been developed to prevent excess amounts of NH<sub>3</sub> from being introduced, and when operation of the SCR system has been proven successful with regard to controlling NH<sub>3</sub> slippage.

- C. As an approved alternative to sorbent or stain tube testing or an NH<sub>3</sub> CEMS, the permit holder may install and operate a second oxides of nitrogen (NO<sub>x</sub>) CEMS probe located upstream of the SCR and the stack NO<sub>x</sub> CEMS, which may be used in association with the SCR efficiency and NH<sub>3</sub> injection rate to estimate NH<sub>3</sub> slip.
- D. Any other method used for measuring NH<sub>3</sub> slippage shall require prior approval from the TCEQ.
- 13. Purchased gas combusted at this facility shall be sweet natural gas containing no more than 5 grains of total sulfur per 100 dry standard cubic feet.
- 14. Flares shall be designed and operated in accordance with the following requirements: (TBD)
  - A. The flare systems shall be designed such that the combined assist natural gas and waste stream to each flare meets the 40 CFR § 60.18 specifications of minimum heating value and maximum tip velocity under normal, upset, and maintenance flow conditions.
    - The heating value and velocity requirements shall be satisfied during operations authorized by this permit. Flare testing per 40 CFR § 60.18(f) may be requested by the appropriate regional office to demonstrate compliance with these requirements.
  - B. The flare shall be operated with a flame present at all times and/or have a constant pilot flame. The pilot flame shall be continuously monitored by a thermocouple or an infrared monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at, a frequency in accordance with the manufacturer's specifications.
  - C. The flare shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. This shall be ensured by the use of steam assist to the flare.
  - D. The permit holder shall install a continuous flow monitor and composition analyzer that provide a record of the vent stream flow and composition to the flare. The flow monitor sensor and analyzer sample points shall be installed in the vent stream as near as possible to the flare inlet such that the total vent stream to the flare is measured and analyzed. Readings shall be taken at least once every 15 minutes and the average hourly values of the flow and composition shall be recorded each hour.

The monitors shall be calibrated on an annual basis to meet the following accuracy specifications: the flow monitor shall be  $\pm 5.0$  percent, temperature monitor shall be  $\pm 2.0$  percent at absolute temperature, and pressure monitor shall be  $\pm 5.0$  mm Hg;

The analyzer shall be calibrated, installed, operated, and maintained, in accordance with manufacturer recommendations, to calculate and record the net heating value of the gas sent to the flare, in British thermal units/standard cubic foot of the gas.

The monitors and analyzers shall operate as required by this section at least 95 percent of the time when the flare is operational, averaged over a calendar 12-month period. Flared gas net heating value and actual exit velocity determined in accordance with 40 CFR § 60.18(f)(4) shall be recorded at least once every 15 minutes.

E. The flare (EPN EFL60731) shall operate in accordance with the 40 CFR 63 Subpart YY "National Emission Standards for Hazardous Air Pollutants: Generic Maximum Achievable Control Technology Standards Residual Risk and Technology Review for Ethylene Production" signed by the EPA Administrator as a final rule on March 12, 2020, the

subsequently promulgated final version of that subpart, and Alternate Method of Control (AMOC) No. 157 issued May 12, 2020. Compliance with the requirements of this paragraph shall begin December 31, 2020 and occur as otherwise specified in the AMOC. Prior to the compliance requirements and schedule of this paragraph, Special Condition Nos. 14.A through 14.D shall apply.(**TBD**)

## **Compliance Assurance Monitoring (CAM)**

- 15. The following requirements apply to capture systems for the OP2 Flare, identified as EPN 48E01.
  - A. The holder of this permit shall perform one of the following:
    - (1) Conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify that there are no leaking components in the capture system; or
    - (2) Once a year, verify the capture systems are leak-free by inspecting in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppmv above background.
  - B. If there is a bypass for the control device, the permit holder shall either:
    - (1) Install a flow indicator that records and verifies zero flow at least once every 15 minutes immediately downstream of each valve that if opened would allow a vent stream to bypass the control device and be emitted, either directly or indirectly, to the atmosphere; or
    - (2) Once a month, inspect the valves, verifying that the position of the valves and the condition of the car seals that prevent flow out the bypass.
      - A bypass does not include authorized analyzer vents, highpoint bleeder vents, low point drains, or rupture discs upstream of pressure relief valve if the pressure between disc and relief valve is monitored and recorded at least weekly. A deviation shall be reported if the monitoring or inspections indicate bypass of the control device when it is required to be in service.
  - C. Records of the inspections required shall be maintained and if the results of any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.

#### **Fugitive Leak Detection and Repair**

Piping, Valves, Connectors, Pumps, and Compressors in VOC Service - 28VHP

- 16. The following requirements apply to piping, valves, connectors, pumps, agitators, and compressors containing or in contact with fluids that could reasonably be expected to contain greater than or equal to 10 weight percent volatile organic compounds (VOC) at any time:
  - A. The requirements of paragraphs F and G shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

- piping and instrumentation diagram (PID);
- a written or electronic database or electronic file;
- color coding;
- a form of weatherproof identification; or
- designation of exempted process unit boundaries.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), API, American Society of Mechanical Engineers (ASME), or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in Paragraph A above. If an unsafe to monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe to monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;

- (1) a cap, blind flange, plug, or second valve must be installed on the line or valve; or
- (2) the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once within the 72 hour period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. If a relief valve is equipped with rupture disc, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed at least quarterly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs is being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, then the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

Replacements for leaking components shall be re-monitored within 15 days of being placed back into VOC service and full unit reaches operating pressure.

- G. Except as may be provided for in the special conditions of this permit, all pump and compressor seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored.
  - These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump and compressor seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days and a record of the attempt shall be maintained.
- I. A leaking component shall be repaired as soon as practicable, but no later than 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on

the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shut down as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I) or 500 pounds, whichever is greater, the TCEQ Regional Manager and any local programs shall be notified and the TCEQ Executive Director may require early unit shut down or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator's log or equivalent.
- K. Alternative monitoring frequency schedules of 30 TAC §§ 115.352 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F and G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.
- 17. Pumps and compressors equipped with single seals in HRVOC (as defined in 30 TAC § 115.10 unless exempted by § 115.787) or greater than 10 weight percent benzene service shall be monitored with a leak definition of 500 ppmv rather than the 2,000 ppmv identified in Special Condition No. 16.H.
- 18. In addition to the weekly physical inspection required by Item E of Special Condition No. 16, all connectors in non-HRVOC gas/vapor and light liquid service shall be monitored annually with an approved gas analyzer in accordance with Items F through J of Special Condition No. 16. Alternative monitoring frequency schedules ("skip options") of 40 CFR Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, may be used in lieu of the monitoring frequency required by this permit condition. Compliance with this condition does not assure compliance with requirements of applicable state or federal regulation and does not constitute approval of alternative standards for these regulations.
- 19. In addition to the weekly physical inspection required by Item E of Special Condition No. 16, all accessible connectors in HRVOC gas/vapor and light liquid service shall be monitored quarterly with an approved gas analyzer in accordance with Items F through J of Special Condition No. 16.
  - A. Connectors may be monitored on a semiannual basis if the percent of connectors leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.
    - Connectors may be monitored on an annual basis if the percent of connectors leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of connectors leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

B. The percent of connectors leaking used in paragraph A shall be determined using the following formula:

$$(CI + Cs) \times 100/Ct = Cp$$

Where:

- CI = the number of connectors found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- Cs = the number of connectors for which repair has been delayed and are listed on the facility shutdown log.
- Ct = the total number of connectors in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor connectors.
- Cp = the percentage of leaking connectors for the monitoring period.

Piping, Valves, Connectors, Pumps, and Compressors in VOC Service – 28LAER.

20. This special condition applies to components associated with the construction of F-4419 as submitted in the application dated September 23, 2011.

Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment:

A. The requirements of paragraphs F and G shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

- piping and instrumentation diagram (PID);
- a written or electronic database or electronic file;
- color coding;
- a form of weatherproof identification; or
- designation of exempted process unit boundaries.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in subparagraph A above. If an unsafe-to-monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe-to-monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service and the full unit reaches operating pressure. Adjustments shall be made as necessary to obtain leak-free performance.

Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through. In addition, all connectors shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer with a directed maintenance program in accordance with items F thru J of this special condition.

In lieu of the monitoring frequency specified above, connectors may be monitored on a semiannual basis if the percent of connectors leaking for two consecutive quarterly monitoring periods is less than 0.5 percent. Connectors may be monitored on an annual basis if the percent of connectors leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of connectors leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

The percent of connectors leaking used in paragraph B shall be determined using the following formula:

$$(CI + Cs) \times 100/Ct = Cp$$

## Where:

- CI = the number of connectors found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- Cs = the number of connectors for which repair has been delayed and are listed on the facility shutdown log.
- Ct = the total number of connectors in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including non-accessible and unsafe-to-monitor connectors.
- Cp = the percentage of leaking connectors for the monitoring period.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;

- (1) a cap, blind flange, plug, or second valve must be installed on the line or valve; or
- (2) the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once by the end of the 72 hours period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.
- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer with a directed maintenance program. Non-accessible valves shall be monitored by leak-checking for fugitive emissions at least annually using an approved gas analyzer with a directed maintenance program. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown. A check of the reading of the pressure-sensing device to verify disc integrity shall be performed at least quarterly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs are being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, than the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

A directed maintenance program shall consist of the repair and maintenance of components assisted simultaneously by the use of an approved gas analyzer such that a minimum concentration of leaking VOC is obtained for each component being maintained. Replaced components shall be re-monitored within 15 days of being placed back into VOC service and the full unit reaches operating pressure.

G. All new and replacement pumps, compressors, and agitators shall be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. These seal systems need not be monitored and may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control

systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

All other pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly.

- Н. Damaged or leaking valves, connectors, compressor seals, pump seals, and agitator seals found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days. Records of the first attempt to repair shall be maintained. A leaking component shall be repaired as soon as practicable, but no later than 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shutdown as calculated in accordance with 30 TAC 115.782 (c)(1)(B)(i)(I), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.
- I. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of physical inspections shall be noted in the operator=s log or equivalent.
- J. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.
- K. In lieu of the monitoring frequency specified in paragraph F, valves in gas and light liquid service may be monitored on a semiannual basis if the percent of valves leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.
  - Valves in gas and light liquid service may be monitored on an annual basis if the percent of valves leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.
  - If the percent of valves leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

L. The percent of valves leaking used in paragraph K shall be determined using the following formula:

$$(VI + Vs) \times 100/Vt = Vp$$

Where:

- VI = the number of valves found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- Vs = the number of valves for which repair has been delayed and are listed on the facility shutdown log.
- Vt = the total number of valves in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including non-accessible and unsafe to monitor valves.
- Vp = the percentage of leaking valves for the monitoring period.
- M. Any component found to be leaking by physical inspection (i.e., sight, sound, or smell) shall be repaired or monitored with an approved gas analyzer within 15 days to determine whether the component is leaking in excess of 500 ppmv of VOC. If the component is found to be leaking in excess of 500 ppmv of VOC, it shall be subject to the repair and replacement requirements contained in this special condition.

Piping, Valves, Pumps, and Compressors in contact with NH<sub>3</sub> – 28AVO

- 21. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:
  - A. Audio, olfactory, and visual checks for leaks within the operating area shall be made every shift.
  - B. Immediately, but no later than 24 hours upon detection of a leak, plant personnel shall take at least one of the following actions:
    - (1) Isolate the leak.
    - (2) Commence repair or replacement of the leaking component.
    - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the TCEQ upon request.

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

22. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the cracking heaters (EPN 44HTHTRS F-4401, F-4402, F-4403, F-4404, F-4405, F-4406, F-4407, F-4408, F-4409, F-4410, F-4411, F-4412, F-4413, F-4414, F-4418 and EPN EF4419). Three cracking heater stacks, to be determined by the permit holder with agreement of the TCEQ Houston Regional Office, may be tested as representative of the eight cracking heater stacks.

Ethane Heater (EPN 44E18); Regeneration Heaters (EPNs F4601 and F4361); Flex Regeneration Heaters (EPNs F4351 and F4361); Flexibility DP Heaters (EPNs F4360 and F4360C); and Steam Superheaters (EPNs 48E001A/B). The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.

A. The appropriate TCEQ Regional Office in the region where the source is located shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

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

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

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

Requests to waive testing for any pollutant specified in B of this condition shall be submitted to the TCEQ Office of Permitting and Registration, Austin.

Test waivers and alternate/equivalent procedure proposals for NSPS testing which must have the EPA approval shall be submitted to the TCEQ Regional Director.

- B. Air contaminants emitted from the cracking heaters, ethane heater, and steam superheaters to be tested for include (but are not limited to) nitrogen oxide (NO<sub>x</sub>) and carbon monoxide.
- C. Sampling may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office.
- D. The source being tested shall operate at maximum represented operating rates during stack emission testing. Primary operating parameters that enable determination of firing rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting.
  - If the source is unable to operate at maximum represented operating rates during testing, then additional stack testing may be required when higher represented operating rates are achieved.
- E. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after all sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Houston Regional Office, Houston.

One copy to the Harris County Air Pollution Control Program, Pasadena.

## **Continuous Demonstration of Compliance**

- 23. The permit holder shall install, calibrate, and maintain a predictive emission monitoring system (PEMS) to measure and record the in-stack concentration of NO<sub>x</sub> from the Cracking Heaters (EPN 44HTHTRS F-4401, F-4402, F-4403, F-4404, F-4405, F-4406, F-4407, F-4408, F-4410, F-4411, F-4412, F-4413, F-4414, F-4415, F-4418 and EPN EF4419) when in operation.
  - A. A PEMS may be used for demonstrating continuous compliance if it can be proven to have the same or better accuracy, precision, reliability, accessibility, and timeliness as that provided by a hardware CEMS. All PEMS shall be subject to the approval of the TCEQ Executive Director. Owners or operators must petition the TCEQ Executive Director for approval to use PEMS. The petition must include results of tests conducted beforehand to demonstrate equivalent accuracy and precision of PEMS to that of hardware CEMS. Demonstrating equivalency of PEMS to CEMS shall be met by instantaneously comparing data collected by PEMS with that collected by a certified hardware CEMS or an EPA reference method. For a PEMS replacing a CEMS, both systems shall remain in place for at least an operating quarter collecting valid information before the CEMS is removed.
  - B. For any unit at which the PEMS is installed, PEMS initial certification by the TCEQ shall occur while the unit is firing its primary fuel. The owner or operator shall:
    - (1) Conduct relative accuracy testing for  $NO_x$  and  $O_2$ , or carbon dioxide ( $CO_2$ ) per 40 CFR Part 60, Appendix B, Performance Specifications 2, 3, and 4, respectively, at low, medium, and high levels of the most significant operating parameter affecting  $NO_x$  emissions.
    - (2) Conduct statistical test analysis at low, medium, and high levels of the most significant operating parameter affecting NO<sub>x</sub> emissions. A minimum of 30 successive paired data points which are either 15-minute averages, 20-minute averages, or hourly averages must be collected at each tested level before a reliable statistical test can be performed.

Data collection must be continuous at all times except when calibration of the reference method must be conducted for the purpose of collecting data for RATA.

The following three tests must be conducted to demonstrate precision:

- (a) A T-test for bias per Appendix A, 40 CFR Part 75, § 7.6. The test shall be conducted using all paired data points collected at all three tested levels.
- (b) An F-test per 40 CFR § 75.41(c)(1). The F-test must be conducted separately at the three tested levels.
- (c) A correlation analysis per 40 CFR § 75.41(c)(2). Calculation of the correlation coefficient (Equation 27) shall be performed using all paired data points collected at all three tested levels.
- (3) For NO<sub>x</sub> for the purpose of conducting an F-test, if the standard deviation (SD) of the reference method is less than either 3 percent of the span or 5 parts per million (ppm), use a reference method SD of the greater of 5 ppm or 3 percent of span.

- (4) For diluent CO<sub>2</sub> or O<sub>2</sub> and for the purpose of conducting an F-test, if the SD of the reference method is less than 3 percent of span, use a reference method SD of 3 percent of span.
- (5) For NO<sub>x</sub> at any one tested level, if the mean value of the reference method is less than either 10 ppm or 5 percent of the standard, all statistical tests are waived for that emission parameter at that specific tested level.
- (6) For either O<sub>2</sub> or CO<sub>2</sub> and at any one tested level, if the mean value of the reference method is less than 3 percent of span, all the statistical tests are waived for that diluent parameter at that specific tested level.
- C. The monitoring data shall be reduced to hourly average concentrations at least once every day, using a minimum of four equally spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of pound per million Btu at least once every week.
- D. All monitoring data and quality-assurance data shall be maintained by the permit holder.
- E. Any PEMS downtime shall be reported to the appropriate TCEQ Regional Director per § 117.345(d)(3) and necessary corrective action shall be taken. Quality-assured (or valid) data must be generated when the Cracking Heaters (EPN 44HTHTRS and EF4419) are operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the Cracking Heaters (EPN 44HTHTRS and EF4419) operated over the previous rolling 12-month period. Owners or operators shall demonstrate that all missing data can be accounted for in accordance with the applicable missing data procedures of 30 TAC 117.340. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.
- F. The appropriate TCEQ Regional Office shall be notified for each annual RATA in order to provide them the opportunity to observe the testing.
- G. The owner or operator shall perform daily sensor validation. The owner or operator shall develop and implement plans that will ensure proper functioning of the monitoring systems, ensure proper accuracy and calibration of all operational parameters that affect emissions and serve as input to the predictive monitoring system, and ensure continuous operation within the certified operating range.
- H. In accordance with the procedure of § 2.3.1, Appendix B of 40 CFR Part 60, a RATA must be performed every six months for each unit while firing its primary fuel. A RATA may be performed annually if the relative accuracy of the previous audit is 7.5 percent or less.
- For each of the three successive quarters following the quarter in which initial certification
  was conducted, RATA and statistical testing must be conducted for at least one unit in a
  category of units in accordance with the procedures outlined for initial certification under
  Section B.
- J. Any RATA exceeding 20 percent or statistical test exceeding the applicable standard shall be reported to the appropriate TCEQ Regional Director, and necessary corrective action shall be taken.
- K. When an alternative fuel is fired in a unit, PEMS must be re-certified in accordance with the certification procedures outlined for initial certification under § B. Owners or operators may justify to the satisfaction of the TCEQ Executive Director that slight changes in fuel

- composition do not constitute an alternative fuel. No additional recertification procedures are required if the unit meets the current monitoring requirements when switching back to the normal fuel from an alternate fuel.
- L. The system is required to provide valid emission predictions for at least 95 percent of the time that the unit being monitored is operated. The following rules for tuning without recertification shall be followed:
  - (1) The model did not change fundamentally.
  - (2) The model continues to operate within the initially certified operating ranges.
    Otherwise, the system must be recertified. Any tuning must be documented, and the records must be made available during any future inspection.
- M. All owners or operators shall develop a quality-assurance plan or manual that insures continuous and reliable performance of the PEMS. As part of the plan, owners or operators shall recommend a frequency for calibrating each sensor whose readout serves as an input to the model. All sensors, at a minimum, shall be calibrated as often as recommended by the manufacturer.
- N. As an alternative to Special Condition 22 A.-E. the permit holder may install a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of NO<sub>x</sub> from the Cracking Heaters (EPN 44HTHTRS: F-4401, F-4402, F-4403, F-4404, F-4405, F-4406, F-4407, F-4408, F-4409, F-4410, F-4411, F-4412, F-4413, F-4414, F-4415, F-4418 and EPN EF4419 F-4419) when in operation.
- 24. Opacity of emissions from cracking heaters, heaters, and decoking cyclones shall not exceed 15 percent average over a six-minute period except for those periods described in 30 TAC § 111.111.

#### **Production Limits and Recordkeeping**

25. Production rates shall not exceed 11.3 billion pounds per year of all products. The holder of this permit shall maintain records on the operation of the facility that shall include (but are not limited to) hours of operation, production rates, hours of operation of each heater unit, time period preregeneration gases are purged to each flare unit, and time period regeneration cycle emits to the atmosphere.

## **Cooling Towers**

26. The VOC associated with cooling tower water shall be monitored monthly with an air stripping system meeting the requirements of the TCEQ Sampling Procedures Manual, Appendix P (dated January 2003 or a later edition) or an approved equivalent sampling method. The results of the monitoring, cooling water flow rate, and maintenance activities on the cooling water system shall be recorded. The monitoring results and cooling water hourly mass flow rate shall be used to determine cooling tower hourly VOC emissions. The rolling 12-month cooling water emission rate shall be recorded on a monthly basis and be determined by summing the VOC emissions between VOC monitoring periods over the rolling 12-month period. The emissions between VOC monitoring periods shall be obtained by multiplying the total cooling water mass flow between cooling water monitoring periods by the higher of the 2 VOC monitored results. Cooling water sampling as required by 30 TAC Chapter 115 Subchapter H may be used in lieu of this special condition.

27. Cooling water shall be sampled once a week for total dissolved solids (TDS) and once a day for conductivity. Dissolved solids in the cooling water drift are considered to be emitted as PM<sub>10</sub>. The data shall result from collection of water samples from the cooling tower feed water and represent the water being cooled in the tower. Water samples should be capped upon collection, and transferred to a laboratory area for analysis. The analysis method for TDS shall be EPA Method 160.1, ASTM D5907, and SM 2540 C [SM - 19th edition of Standard Methods for Examination of Water]. The analysis method for Conductivity shall be ASTM D1125-95A and SM2510 B. Use of an alternative method shall be approved by the TCEQ Regional Director prior to its implementation.

## **Engine**

- 28. The following requirements shall apply to the Diesel Engine-Driven Air Compressor (EPN OP2EN1): **(TBD)** 
  - A. Fuel for the engine shall be limited to ultra-low sulfur diesel (ULSD) containing no more than 15 ppmw total sulfur.
  - B. The engine shall be limited to 4,500 hours per year.
  - C. The engine shall be equipped with a non-resettable hour meter.
  - D. Compliance with the emission factors represented in the permit amendment application (PI-1 dated November 19, 2019) shall be demonstrated by retaining a copy of the manufacturers' certificate of conformity, or through other methods receiving prior written approval of the TCEQ Executive Director

#### Wastewater

29. Process wastewater drains shall be equipped with water seals or equivalent; lift stations, manholes, junction boxes, any process wastewater collection system components, and conveyance, shall be equipped with a closed vent system that routes all organic vapor to a control device.

Water seals shall be checked by visual, physical inspection or Method 21 monitoring quarterly for indications of low water levels or other conditions that would reduce the effectiveness of water seal controls. Water seals shall be restored as necessary within 24 hours. Records shall be maintained of these inspections and corrective actions taken.

## Planned Maintenance, Startup and Shutdown (MSS)

30. This permit authorizes the emissions from facilities for the planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachment C) attached to this permit.

Routine maintenance activities, as identified in Attachment B of this permit, may be tracked through work orders or their equivalent. Emissions from activities identified in Attachment B shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit application.

The performance of each planned MSS activity not identified in Attachment B and the emissions associated with it shall be recorded and include at least the following information:

- A. the process unit at which emissions from the MSS activity occurred, including the emission point number and common name of the process unit;
- B. the type of planned MSS activity and the reason for the planned activity;
- C. the common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
- D. the date and time of the MSS activity and its duration;
- E. the estimated quantity of each air contaminant, or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the permit application, consistent with good engineering practice.
  - All MSS emissions shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis.
- 31. Process units and facilities, shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements:
  - A. The process equipment shall be depressurized to a control device, transferred within the process unit, transferred to another process unit, transferred to a pressurized storage tank, or depressurized to a controlled recovery system prior to venting to atmosphere, degassing, or draining liquid. Equipment that only contains material that is liquid with volatile organic compounds (VOC) partial pressure less than 0.50 pound per square inch, absolute (psia) at the highest of the actual temperature or 95°F may be opened to atmosphere and drained in accordance with Paragraph C of this special condition. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded.
  - B. If mixed phase materials must be removed from process equipment, the cleared material shall be routed to a knockout drum or equivalent to allow for managed initial phase separation, transferred within the process unit, transferred to another process unit, or transferred to a pressurized storage tank. If the VOC partial pressure is greater than 0.50 psi at either the actual temperature or 95°F, any vents in the system must be routed to a control device or a controlled recovery system. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. Control must remain in place until degassing has been completed or the system is no longer vented to atmosphere.
  - C. All liquids from process equipment or storage vessels must be removed to the maximum extent practical prior to opening equipment to commence degassing and/or maintenance. Liquids must be drained into a closed vessel or closed liquid recovery system unless prevented by the physical configuration of the equipment, transferred within the process unit, transferred to another process unit, or transferred to a pressurized or an atmospheric storage tank. If it is necessary to drain liquid into an open pan or sump, the liquid must be covered or transferred to a covered vessel within one hour of being drained.
  - D. If the VOC partial pressure is greater than 0.50 psi at the normal process temperature or 95°F, facilities shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the control device or controlled recovery system to the extent allowed by process equipment or storage vessel design. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. The facilities to be degassed shall not be vented directly to atmosphere, except as necessary to establish isolation of the work area or to monitor VOC

concentration following controlled depressurization. The venting shall be minimized to the maximum extent practicable and actions taken recorded. The control device or recovery system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.

- (1) For MSS activities identified in Attachment B, the following option may be used in lieu of item (2) below. The facilities being prepared for maintenance shall not be vented directly to atmosphere until the VOC concentration has been verified to be less than 10,000 ppmv or less than 10 percent of the lower explosive limit (LEL) per the site safety procedures.
- The locations and/or identifiers where the purge gas or steam enters the process (2) equipment or storage vessel and the exit points for the exhaust gases shall be recorded (process flow diagrams [PFDs] or piping and instrumentation diagrams [P&IDs] may be used to demonstrate compliance with the requirement). If the process equipment is purged with a gas, two system volumes of purge gas must have passed through the control device or controlled recovery system before the vent stream may be sampled to verify acceptable VOC concentration prior to uncontrolled venting. The VOC sampling and analysis shall be performed using an instrument meeting the requirements of SC No. 29. The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged. The facilities shall be degassed to a control device or controlled recovery system until the VOC concentration is less than 10,000 ppmv or 10 percent of the LEL. Documented site procedures used to de-inventory equipment to a control device for safety purposes (e.g., hot work or vessel entry procedures) that achieve at least the same level of purging may be used in lieu of the above.
- E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:
  - (1) It is not technically practicable to depressurize or degas, as applicable, into the process;
  - (2) There is not an available connection to a plant control system (flare); and
  - (3) There is no more than 50 lbs of air contaminant to be vented to atmosphere during shutdown or start-up, as applicable.

All instances of venting directly to atmosphere per sub-paragaph E. of this condition must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those planned MSS activities identified in Attachment B.

- 32. Air contaminant concentration shall be measured using an instrument/detector meeting one set of requirements specified below.
  - A. VOC concentration shall be measured using an instrument meeting all the requirements specified in EPA Method 21 (40 CFR Part 60, Appendix A) with the following exceptions:
    - (1) The instrument shall be calibrated within 24 hours of use with a calibration gas such that the response factor (RF) of the VOC (or mixture of VOCs) to be monitored shall be less than 2.0. The calibration gas and the gas to be measured, and its approximate RF

shall be recorded. If the RF of the VOC (or mixture of VOCs) to be monitored is greater than 2.0, the VOC concentration shall be determined as follows:

VOC Concentration = Concentration as read from the instrument\*RF

In no case should a calibration gas be used such that the RF of the VOC (or mixture of VOCs) to be monitored is greater than 5.0.

- (2) Sampling shall be performed as directed by this permit in lieu of section 8.3 of Method 21. During sampling, data recording shall not begin until after two times the instrument response time. The date and time shall be recorded, and VOC concentration shall be monitored for at least five minutes, recording VOC concentration each minute. As an alternative the VOC concentration may be monitored over a five-minute period with an instrument designed to continuously measure concentration and record the highest concentration read. The highest measured VOC concentration shall be recorded and shall not exceed the specified VOC concentration limit prior to uncontrolled venting.
- B. Colorimetric gas detector tubes may be used to determine air contaminant concentrations if they are used in accordance with the following requirements.
  - (1) The air contaminant concentration measured as defined in (3) is less than 80 percent of the range of the tube and is at least 20 percent of the maximum range of the tube.
  - (2) The tube is used in accordance with the manufacturer's guidelines.
  - (3) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting:

measured contaminant concentration (ppmv) < release concentration.

Where the release concentration is:

10,000\* mole fraction of the total air contaminants present that can be detected by the tube.

The mole fraction may be estimated based on process knowledge. The release concentration and basis for its determination shall be recorded.

Records shall be maintained of the tube type, range, measured concentrations, and time the samples were taken.

- C. Lower explosive limit measured with a lower explosive limit detector.
  - (1) The detector shall be calibrated within 30 days prior to use with a certified pentane gas standard at 58 percent of the LEL for pentane. Records of the calibration date/time and calibration result (pass/fail) shall be maintained.
  - (2) A functionality test shall be performed within 24 hours prior to use on each detector using the same certified gas standard used for calibration. The LEL monitor shall read no lower than 90 percent of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.
  - (3) A certified methane gas standard equivalent to 58 percent of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95 percent of that for pentane.
- D. Gas Chromatograph. As an alternative to an instrument/detector, the analysis may be conducted in a laboratory. Bag samples of the gas discharged may be drawn and taken to an onsite laboratory to be analyzed by gas chromatography (GC). A minimum of two bag

samples shall be drawn approximately ten minutes apart. A Tedlar bag, or a bag or glass container appropriate for the material to be sampled, shall be used and shall have a valve to seal gas in the bag or container. The samples shall be drawn as follows:

- (1) The sample point on the equipment being cleared shall be purged sufficiently to ensure a representative sample at the sample valve.
- (2) The sample bag shall be connected directly to the sample valve or to a pump that is connected directly to the sample valve.
- (3) The sample valve and sample bag shall be opened to allow the bag to fill to approximately 80% of capacity. The sample connections shall be fitted such that no air is drawn into the sample bag.
- (4) The two valves shall then be closed to seal the sample in the bag.
- (5) The sample bag shall then be disconnected and placed in a dark container out of direct sunlight for transport to the analyzer.
- (6) This process is repeated to collect additional samples.
- (7) The sample shall be analyzed within 12 hours of collection.
- (8) If condensation is observed in a bag sample, the sampling must be repeated using one of the modified bag sampling procedures in 40 CFR 60, Appendix A, Method 18 Section 8.
- (9) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting.
  - The laboratory GC shall meet or exceed the requirements of 40 CFR 60, Appendix A, Method 18 Sections 6 (Equipment and Supplies), 7 (Reagents and Standards), 9 (Quality Control), and 10 (Calibration and Standards). The sample shall be analyzed per Section 8.2.1.5 of Method 18, except the analysis of each bag may be performed in duplicate and use gas tight syringe through septums. The highest measured VOC concentration shall not exceed the specified VOC concentration limit prior to uncontrolled venting. The recovery study for bag sampling and post analysis calibration is only required the first time a vessel is degassed and analyzed if the procedure meets the accuracy specifications of Method 18 and the analytical equipment is not modified. If the material content, temperature and pressure are the same among multiple vessels when sampling occurs, the post analysis calibration need only be conducted on sample(s) from one representative vessel.
- 33. This condition applies only to piping and components subject to leak detection and repair monitoring requirements. Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an openended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period:
  - A. cap, blind flange, plug, or second valve must be installed on the line or valve; or
  - B. The open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once

within the 72-hour period following the creation of the open-ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings 500 ppmv above background and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

- 34. Additional occurrences of MSS activities authorized by this permit may be authorized under permit by rule only if conducted in compliance with this permit's procedures, emission controls, monitoring, and recordkeeping requirements applicable to the activity.
- 35. Planned maintenance activities must be conducted in a manner consistent with good practice for minimizing emissions, including the use of air pollution control equipment, practices and processes. All reasonable and practical efforts to comply with Special Condition Nos. 29 through 34 must be used when conducting the planned maintenance activity, until the Commission determines that the efforts are unreasonable or impractical, or that the activity is an unplanned maintenance activity.

### **Netting & Offsets**

36. This Prevention of Significant Deterioration (PSD) permit (PSDTX1270, 25.71 tpy NO<sub>x</sub> project increase) is conditioned on the completion of the emission reduction project represented in the permit application (PI-1 dated September 23, 2011) as follows:

Methanol Unit	Shutdown	November 2008	}
Total NOx R	eduction:	780.4 tpy	

These reductions shall occur prior to the start of operation of the facilities and activities authorized by the indicated PSD permit. The permit holder shall maintain records of these emission reductions.

Construction of the authorized facilities must begin as defined in 40 CFR  $\S$  52.21(b)(9), no later than five years after the all emission reductions identified in the NO<sub>x</sub> netting analysis are actually accomplished. If construction does not begin as specified, the netting reductions will no longer be creditable.

This Nonattainment New Source Review (NNSR) permit (N140) is issued based on the permanent retirement of a TCEQ Emission Reduction Credit (ERC) for 25.6 tpy of VOC emissions reduction at Equistar's Chocolate Bayou Polymer Facility. This ERC provides offsets at the rate of 1.3:1 for the 19.7 tpy of VOC emissions authorized as a project increase by the indicated NNSR permit.

- A. The permit holder shall use 25.6 tpy ECs of VOC from TCEQ credit certificate number 3518 to offset the 19.7 tpy VOC project emission increase for the facilities authorized by this permit at a ratio of 1.3 to 1.0. **(TBD)**
- 37. This Nonattainment New Source Review (NNSR) permit is issued/approved based on the requirement that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H. (TBD)

Special Conditions Permit Numbers 2933, PSDTX1270, and N140M1 Page 25

- A. The permit holder shall use 6.9 tpy of NOx credits to offset the 5.8 tpy NOx project emission increase for the facilities authorized by this permit at a ratio of 1.20 to 1.0.
- B. Prior to the commencement of operation, the permit holder shall obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.

## **Standard Permit Reference**

38. The following sources and/or activities are authorized under a Permit by Rule (PBR) by a Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit.

Authorization	Source or Activity
Pollution Control Project (PCP) Standard Permit No. 150877	Replacement burner for heater F-4402 (EPN 44HTHTRS)

Date:	TBD	

# Attachment A

# Permit Numbers 2933, PSDTX1270, and N140

# Multiple Products Approved for Storage

Tank	EPN	Service
TK-4455	44E12	Water Caustic
TK-48007	48E22	PFO
TK-48008	48E008	Slop Oil
TK-48009	48E009	Wastewater
TK-48010	48E010	Wastewater
TK-48011	48E011	Wastewater
TK-48302	48E07	PGO
TK-48303	48E08	Slop Oil
TK-48304	48E20	PFO & PGO
TK-48305	48E21	LCO & PGO
TK-4901	49E01	Olefins Feedstock, Pygas, Light Pygas
TK-4902	49E02	Olefins Feedstock, Pygas, Light Pygas
TK-4903	49E03	Olefins Feedstock, Pygas, Light Pygas, DRIPS
TK-4904	49E04	Olefins Feedstock, Pygas, Light Pygas
TK-4905	49E05	Olefins Feedstock, Pygas, Light Pygas
TK-4906	49E06	Olefins Feedstock, Pygas, Light Pygas
TK-4907	49E07	Olefins Feedstock, Pygas, Light Pygas
TK-4915	49E08	PGO
TK-4916	49E09	Benzene, DRIPs, Raw Pygas, Heartcut Pygas, Light Pygas, Heavy Pygas, Toluene
TK-4917	49E10	Light Pygas, Toluene, Heavy Pygas & Toluene
TK-4919	49E11	Light Pygas, Toluene
TK-4921	49E12	Heavy Pygas
TK-4922	49E13	Light Pygas, Toluene, Heavy Pygas, DRIPs, Raw Pygas, Heartcut Pygas
D-4311	43E01	Catalyst Mixture
D-4310	43E03	Catalyst Mixture
OP2SMLTK50	OP2SMLTK50	Additive Mixture
OP2SMLTK33	OP2SMLTK33	Antifoulant

Date:	January 29, 2020

## Attachment B

# Permit Numbers 2933, PSDTX1270, and N140

## **Routine Maintenance Activities**

Pump repair/replacement

Fugitive component (valve, pipe, flange) repair/replacement

Compressor repair/replacement

Heat exchanger repair/replacement

Process & Storage Vessel cleaning/repair/replacement

Date: January 29, 2020

#### Attachment C

### Permit Numbers 2933, PSDTX1270, and N140

### MSS Activities Summary

Facilities	Description	<b>Emissions Activity</b>	EPN
F-4419 and ancillary piping	Process unit purge/degas/drain	Vent to atmosphere	ENMSSROUT
Flare MSS	OP2 Flare	Vent to atmosphere	48E01

Date: January 29, 2020

#### Permit Numbers 2933, PSDTX1270, and N140M1

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

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant	Emission Rates		
Linission Foint No. (1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)	
48E11	OP2 Cooling Tower	VOC	12.10	22.71	
		PM	7.88	34.53	
		PM <sub>10</sub>	3.94	17.27	
		PM <sub>2.5</sub>	0.02	0.07	
EOP2FUGEXP	OP2 Fugitives (5)	voc	0.46	2.01	
EOP2DECOKE2	Decoke Vent 2	СО	310.00	59.60	
		VOC	0.08	0.02	
		PM	1.07	0.10	
		PM <sub>10</sub>	1.07	0.10	
		PM <sub>2.5</sub>	1.07	0.10	
ENMSSROUT	MSS Vessel – F4419 and Ancillary Piping/Equipment	VOC	4.37	0.05	
EOP2ANALY	Analyzers – F4419	VOC	0.03	0.13	
OP2PV48055	Analyzer Vent	VOC	0.08	0.35	
48E4501A	OP-2 Analyzer	VOC	0.01	0.01	
48E4301	Shelter J-4301	VOC	0.26	1.09	
48E4303	Shelter J-4303	VOC	0.11	0.48	
48E01	OP2 Flare (6)	VOC	978.41	43.84	
		NOx	163.46	21.53	
		СО	842.37	107.94	
		SO <sub>2</sub>	33.67	6.83	
43E01	D-4311 NCTBP Tank	VOC	22.19	0.47	

43E03	D-4310 EADC Tank	VOC	33.19	0.41
43E04	Regeneration Heater I F-4351	NOx	1.30	5.69
		SO <sub>2</sub>	0.09	0.41
		СО	1.09	4.78
		VOC	0.07	0.28
		PM	0.10	0.46
		PM <sub>10</sub>	0.10	0.46
		PM <sub>2.5</sub>	0.10	0.46
43E05	Butene Reactors Regeneration Vent	со	6.92	4.98
		VOC	5.86	5.54
43E06	DP Heater F-4360	NOx	1.60	7.01
		SO <sub>2</sub>	0.12	0.50
		СО	1.34	5.89
		VOC	0.08	0.35
		PM	0.13	0.56
		PM <sub>10</sub>	0.13	0.56
		PM <sub>2.5</sub>	0.13	0.56
43E11	DP Heater F4360C	NOx	1.60	7.01
		SO <sub>2</sub>	0.12	0.50
		СО	1.34	5.89
		VOC	0.08	0.35
		PM	0.13	0.56
		PM <sub>10</sub>	0.13	0.56
		PM <sub>2.5</sub>	0.13	0.56
43E07	Regeneration Heater II-F-4361	NOx	0.40	1.75

	T	ļ ·		1
		SO <sub>2</sub>	0.03	0.13
		СО	0.34	1.47
		VOC	0.02	0.09
		PM	0.03	0.14
		PM <sub>10</sub>	0.03	0.14
		PM <sub>2.5</sub>	0.03	0.14
F44E00	Olefins II Unit Fugitives (5) (includes Flex Fugitives F43E00)	VOC	94.85	406.82
44FGWATER	OP II Wastewater Fugitives (5)	voc	1.15	5.03
44HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters:	NO <sub>x</sub>	494.76	2021.19
	F-4401- F-4415; F-4418; F-4419	SO <sub>2</sub>	33.84	138.13
	Common Stack Steam Super Heaters: F480001 A / B	СО	395.23	1611.75
		VOC	24.97	99.15
		PM	37.60	153.48
		PM <sub>10</sub>	37.60	153.48
		PM <sub>2.5</sub>	37.60	153.48
EF4419	Expansion Heater EF4419	NOx	38.40	25.71
		СО	33.80	148.38
		SO <sub>2</sub>	0.38	1.54
		VOC	0.64	2.57
		PM	4.23	17.00
		PM <sub>10</sub>	4.23	17.00
		PM <sub>2.5</sub>	4.23	17.00
		NH <sub>3</sub>	2.69	11.78
44E08	Decoke Vent	СО	132.00	113.75
		PM	36.00	6.50

		PM <sub>10</sub>	36.00	6.50
		PM <sub>2.5</sub>	36.00	6.50
		VOC	0.11	0.10
44E10	Reactor Regenerator Vent	VOC	2.00	0.17
		SO <sub>2</sub>	8.26	2.12
		CO	82.98	16.55
46E05	Regeneration Heater F4601	NOx	2.50	2.63
		SO <sub>2</sub>	0.18	0.19
		СО	2.10	2.21
		VOC	0.13	0.13
		PM	0.20	0.21
		PM <sub>10</sub>	0.20	0.21
		PM <sub>2.5</sub>	0.20	0.21
45E11	Antifoulant Storage Tank 4511	VOC	0.55	0.01
46E07	Antifoulant Storage Tank 4607	VOC	0.28	0.01
48E07	Pyrolysis Gas Oil Tank 48302	VOC	7.75	2.47
		Benzene	0.05	0.02
48E08	Slop Oil Tank 48303	VOC	0.69	2.27
		Benzene	0.62	0.16
48E22	Pyrolysis Fuel Oil Tank 48007	VOC	12.62	14.53
		Benzene	0.13	0.17
48E20	Pyrolysis Fuel Oil Tank 48304	VOC	18.61	7.54
		Benzene	0.16	0.06
48E21	Storage Tank 48305	VOC	18.61	7.48
		Benzene	0.16	0.11
49E01	Storage Tank 4901	VOC	8.38	-

	T	Panzana	1.13	
		Benzene	1.13	-
		H <sub>2</sub> S	<0.01	-
49E02	Storage Tank 4902	VOC	8.38	-
		Benzene	0.27	-
		H2S	<0.01	-
49E03	Storage Tank 4903	VOC	8.38	-
		Benzene	2.56	-
		H2S	<0.01	-
49E01 to 49E03	Storage Tanks (3 total)	VOC	-	36.21
		Benzene	-	1.64
		H <sub>2</sub> S	-	0.02
49E04	Storage Tank 4904	VOC	6.03	-
		Benzene	3.71	-
		H2S	<0.01	-
49E05	Storage Tank 4905	VOC	6.03	-
		Benzene	3.71	-
		H2S	<0.01	-
49E06	Storage Tank 4906	VOC	5.81	-
		Benzene	3.31	-
		H <sub>2</sub> S	<0.01	-
49E07	Storage Tank 4907	VOC	5.12	-
		Benzene	3.39	-
		H <sub>2</sub> S	<0.01	-
49E04 to 49E07	Storage Tanks (4 total)	VOC	-	37.72
		Benzene	-	9.38

		H <sub>2</sub> S	-	0.03
49E08	Pyrolysis Gas Oil Storage Tank 4815	VOC	0.32	0.33
		Benzene	<0.01	<0.01
49E09	Storage Tank 4916	VOC	1.50	4.03
		Benzene	0.77	2.39
49E10	Storage Tank 4917	VOC	1.84	4.03
		Benzene	0.23	0.47
49E11	Light Pyrolysis Gasoline Storage Tank 4919	VOC	1.28	2.69
		Benzene	0.41	0.89
9E12 Storage Tank 4921		VOC	2.67	2.36
		Benzene	0.73	0.62
49E13	Storage Tank 4922	voc	3.21	7.14
		Benzene	2.29	5.02
45E02	Seal Oil Reservoir Vent	VOC	0.01	0.01
45E07	Seal Oil Reservoir Vent	VOC	0.01	0.01
48E4602	Shelter J-4602	VOC	0.01	0.02
48E4603	Shelter J-4603	VOC	0.08	0.34
48E4604	Shelter J-4604	VOC	0.01	0.05
48E4605	Shelter J-4605	VOC	0.01	0.01
48E4606	Shelter J-4606	VOC	0.01	0.01
48E4607	Shelter J-4607	VOC	0.01	0.01
OP2VJ48013	Shelter J-48013	VOC	0.14	0.56
OP2SMLTK08	Antifoulant Storage Tank 78782	VOC	0.77	0.05
OP2EN1	Diesel Engine-Driven Air Compressor	NOx	1.73	3.88
		СО	3.02	6.80
		SO <sub>2</sub>	<0.01	0.01
		PM	0.02	0.04

		PM <sub>10</sub>	0.02	0.04
		PM <sub>2.5</sub>	0.02	0.04
		VOC	0.16	0.37
44PVD4420	Dilution Generator Vents	VOC	1.97	1.66
		Acetone	0.03	0.03
48HTF4804A/B	Superheater Vents	VOC	4.04	0.01
OP2SMLTK12	Neutralizing Amine Tank 971971	Voc	2.15	0.01
OP2SMLTK05	Corrosion Inhibitor Tank 983323	H <sub>3</sub> PO <sub>4</sub>	2.15	0.01
OP2SMLTK06	Anti-foam Tote (OP-2 Cooling Tower)	VOC	2.15	0.01
44E12	Waste Caustic Tank 4455	VOC	0.43	1.62
		Benzene	0.07	0.27
44E13	Washwater Re-run Tank 4451	VOC	0.01	0.01
48E008	Slop Oil Storage Tank 48008	VOC	0.39	1.70
		Benzene	0.04	0.02
48E009	Wastewater Tank 48009	VOC	1.03	1.84
		Benzene	0.05	1.23
48E010	Wastewater Tank 48010	VOC	1.46	4.18
		Benzene	0.05	0.22
48E011	Wastewater Tank 48011	VOC	2.80	7.54
		Benzene	0.10	0.40
EFUGNH3	OP2 NH₃ Fugitives (5)	NH <sub>3</sub>	0.05	0.24
44STMFUG	Dilution Steam Vent	VOC	0.49	1.61
		Acetone	0.01	0.02
OP2SMLTK33	Antifoulant Storage Tank	VOC	0.27	0.01
OP2SMLTK50	Additive Tank	VOC	0.45	<0.01

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3)

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

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

SO<sub>2</sub> - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented

 $PM_{10}$  - total particulate matter equal to or less than 10 microns in diameter, including  $PM_{2.5}$ , as

represented

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

CO - carbon monoxide

 $NH_3$  - ammonia  $H_3PO_4$  - phosphoric acid

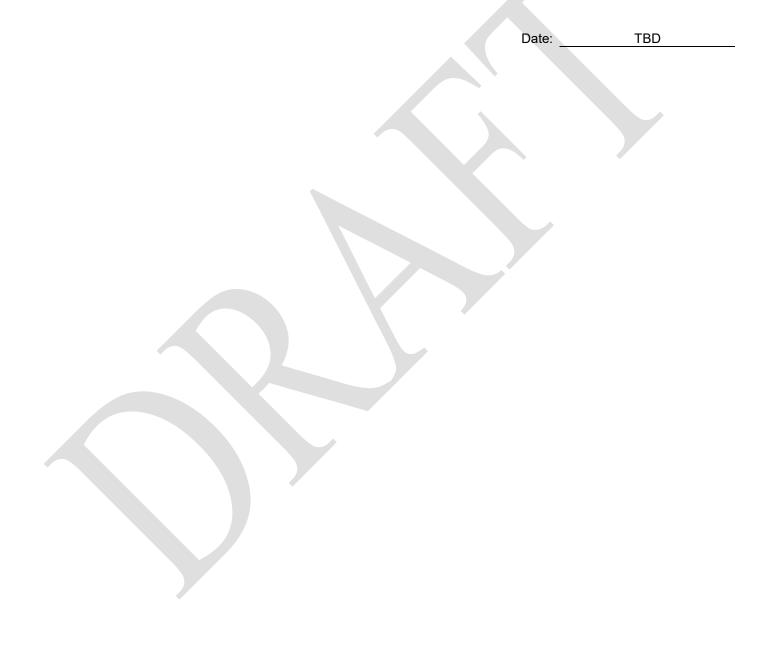
- hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of

Federal Regulations Part 63, Subpart C

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

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

(6) Flare emission rates include routine and MSS emissions.





November 8, 2019

Certified Mail #7015 0640 0002 0784 8385 **EPERMITS 332770** 

Air Permits Review Division Air Permits Initial Review Team - MC 161 Texas Commission on Environmental Quality P.O. Box 13087 Austin, TX 78711-3087

Re: Equistar Chemicals, LP - Channelview Chemical Complex

TCEQ Air Quality Permits No. 2933 Permit Amendment Application Channelview, Texas Harris County

TCEQ Account ID No. HG-0033-B; RN100542281; CN600124705

Equistar Chemicals, LP (Equistar) operates an Olefins (OP2) Unit under Texas Commission on Environmental Quality (TCEQ) Air Quality Permit No. 2933. Equistar requests the amendment of this permit to update emissions from the Unit Flare.

A hard copy with the original signature of the NSR Workbook General sheet, as well, as, copies of the supporting documentation submitted through STEERS is included in this document. Required TCEQ Forms in the NSR Workbook and air dispersion modeling documentation in the EMEW Workbook have been submitted electronically. Relevant documents including emissions details, process description, flow diagrams, BACT and/or LAER analysis, area map, plot plan are included in this application submittal to assist in TCEQ's review. Equistar is requesting this application review be expedited and is sending the Surcharge Form under separate cover letter to the Cashier's Office. The amendment application fees are sent via wire transfer. If you have any questions regarding this application submittal, please contact Teresa Peneguy at (281) 452-8330.

Sincerely, huas Dumement

Tom Warnement

Environmental Team Leader - Air

Enclosure

cc:

Director

Harris County Pollution Control Services

101 South Richey, Suite H

Pasadena, TX 77506

Certified Mail #7015 0640 0002 0784 8392

TCEQ Region 12

submitted via STEERS

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U.S. EPA

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Tel +1 281 862 4000 lyb,com

a Lyondel)Basell company

### NEW SOURCE REVIEW PERMIT AMENDMENT APPLICATION

Permit No. 2933

**Submitted by:** 

Equistar Chemicals, L.P. - Channelview

**TCEQ Account Number HG-0033-B** 

#### **Submitted to:**

Texas Commission on Environmental Quality (TCEQ)
Air Permits Initial Review Team (APIRT)
Air Permits Division, MC-161
P.O. Box 13087
Austin, Texas 78711-3087

November 2019

### TABLE OF CONTENTS

SECTION	N 1 Introduction 1-1
1.1	Purpose
1.2	Permit History
1.3	Facility Information
1.4	PSD and Non-attainment Review
1.5	Application Contents
SECTION	N 2 Process Description2-1
2.1	Process Description
SECTION	N 3 Emission Calculation Methodology3-1
3.1	Flare Emissions
	N 4 Best Available Control Technology and LOWEST ACHIEVABLE ISSION REDUCTION4-1 Flare4-1
SECTION	N 5 Regulatory Applicability 5-1
5.1	General Application Requirements - §116.111
LIST OF	FIGURES
Figure 1-1	Area Map1-4
Figure 1-2	Plot Plan
Figure 2-1	OP2 Unit Process Flow Diagram
	APPENDICES
	A Administrative Considerations and Application Forms
1.1	B Technical Application Tables
Appendix	C Emission Calculations

### SECTION 1 INTRODUCTION

Equistar Chemicals, L.P. (Equistar) operates a Olefins Production (OP2) Unit under Texas Commission on Environmental Quality (TCEQ) Air Quality Permit No. 2933.

#### 1.1 Purpose

Equistar requests the amend Air Quality Permit No. 2933, and is submitting this application as required under 30 TAC 116.111. Equistar is modifying the operation of the existing flare to meet future regulatory requirements. Additional natural gas is required to meet the anticipated operating limit to maintain a net heating value of the flare combustion zone gas (NHVcz) at or above 270 British thermal units per standard cubic feet (Btu/scf). The site anticipates future requirements for the combustion zone that match the limits currently identified in 40 CFR 63 Subpart CC. No changes to the operation of the process unit or process vent controlled by the flare are being made with this project. All increases of volatile organic compounds (VOC) emissions will result from the minimal non-methane and nonethane organics present in the imported natural gas supply. Additionally, the application identifies the sulfur dioxide (SO2) increases resulting from the minimal sulfur present in the natural gas. The combustion products oxides of nitrogen (NOx) and carbon monoxide (CO) that will be generated from the combustion of the additional natural gas are included in the emissions calculations.

The calculations and representations used in this permit amendment are based on best available estimates and should not be considered absolute values for all operating scenarios.

#### **1.2** Permit History

Equistar currently operates the OP2 Unit at their Channelview, Texas manufacturing complex under TCEQ Air Permit No. 2933.

The permit was initially issued in August 1984 for the unit. The permit was last amended on December 5, 2015. The permit is currently in technical review for renewal and amendment (TCEQ Project No. 262158).

#### 1.3 Facility Information

The project described in this application includes emissions related to the Olefins 2 Production unit at the Equistar Channelview Facility. The regulated entity number for the facility is RN100542281. The Channelview Facility includes multiple process units; however, only the OP2 Unit is affected by this amendment. The Equistar Channelview Facility is located on Sheldon Road, Channelview, TX. All units operate under a single Federal Operating Permit, Permit No. O1426.

Figure 1.1 shows the location of the Channelview Facility on the Area Map. A detailed plot plan of the Facility showing the estimated locations of emissions units at the site is also provided in Figure 1.2.

#### 1.4 PSD and Non-attainment Review

The Prevention of Significant Deterioration (PSD) regulations define a "major modification" as a physical change or a change in the method of operation of a major stationary source that would result in a significant emissions increase and a contemporaneous significant net emissions increase of any regulated pollutant. The project is not a major modification and is not subject to PSD or Non-attainment review for VOC, Carbon Monoxide CO, or Green House Gases (GHG). The project is a major modification for NOx and the associated Table 2F is included in Appendix A.

**Table 1-1 PSD and NNSR Review** 

Contaminants	Emissions Increases	PSD Applicability		Non- Attainment Applicability	
		Limit	Netting?	Limit	Netting?
VOC	2.16	40	No	5	No
SO2	2.81	40	No		
CO	29.49	100	No		
NOx	5.73	40	No	5	Yes

#### 1.5 Application Contents

Key components of this application are organized as follows:

- An area map and a plot plan are provided at the end of Section 1.
- > A process description and process flow diagram are included in Section 2.
- > Emissions calculations methodologies are included in Section 3.
- ➤ Best Available Control Technology (BACT) and Lowest Achievable Emissions Limit (LAER) are addressed in Section 4.
- > Regulatory applicability and compliance strategies are addressed in Section 5.
- Appendix A contains completed TCEQ administrative forms, PI-1 signature page from the NSR Workbook and the Expedited Permit Request Form APD-EXP
- > Appendix B contains TCEQ Table 2F Project Emissions Increases.
- > Appendix C contains emission rate calculations for all Emissions Points.

Figure 1-1 Area Map

Figure 1-1 Area Map Equistar Chemicals, L.P. - Channelview

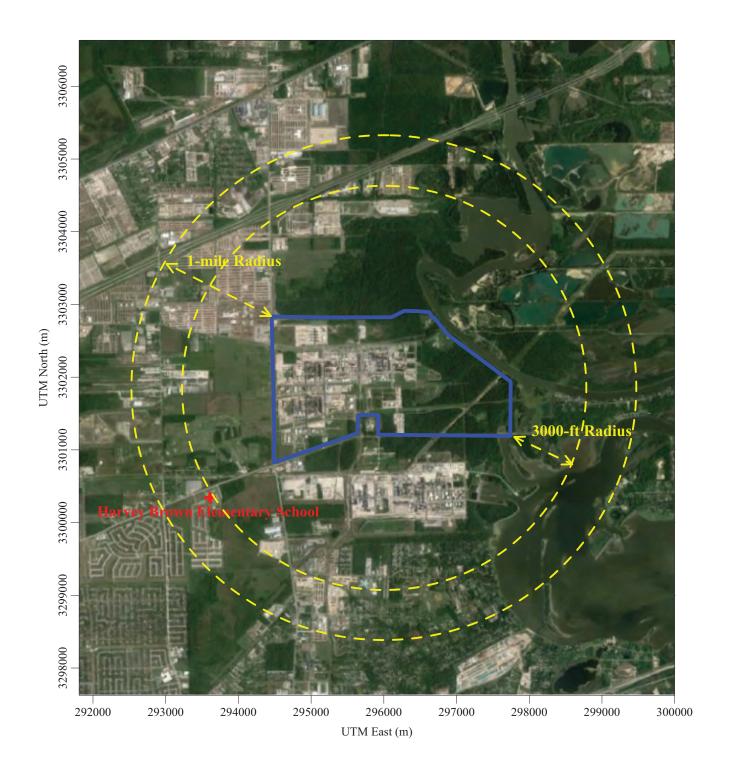
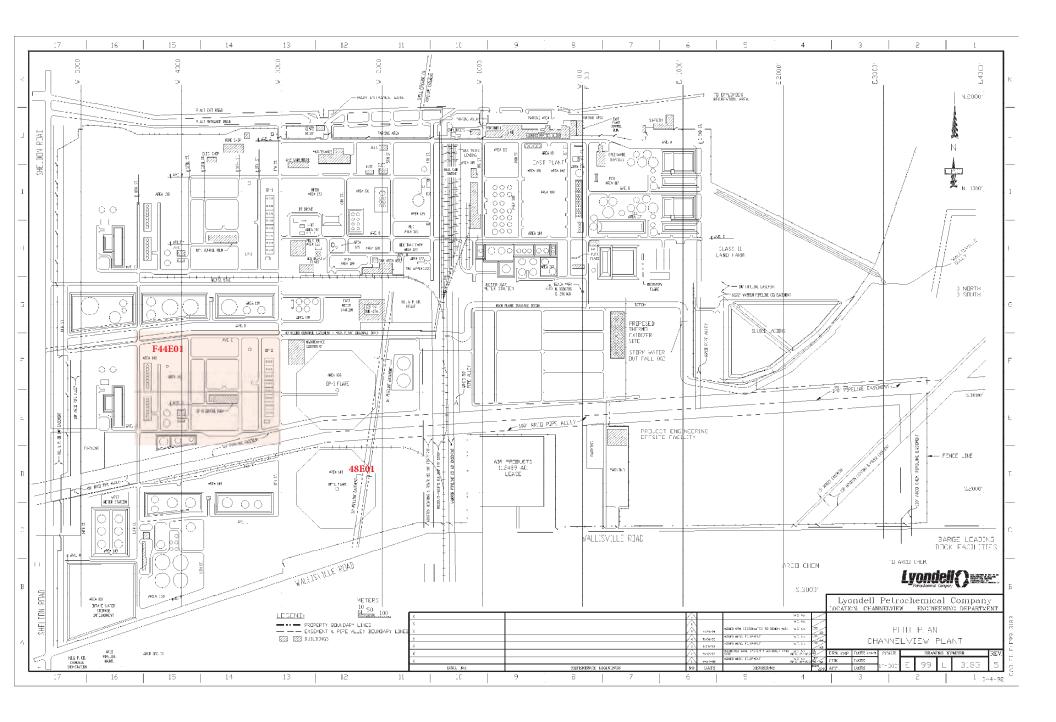


Figure 1-2 Plot Plan



### SECTION 2 PROCESS DESCRIPTION

#### 2.1 Process Description

The OP2 Unit consists of cracking furnaces, where pyrolysis (cracking by heat) occurs, fractionation equipment to separate and purify the raw products, catalytic reactors to convert some by-products, heat exchangers to control process temperatures and provide energy efficiency, liquid pumps and gaseous compressors. Additionally, there is utility equipment to support utilities to the olefins process operations.

Cracking & Quench (C&Q) is the front-end of the unit where feedstock is cracked into smaller chain molecules, and initial fractions are produced. The cracking furnaces (EPNs: 44HTHRTRS, EF4419) accommodate a variety of feed stocks. Liquid feeds to the cracking furnaces are generally pumped into tankage (EPNs: 49E01 – 49E07) and then routed to the cracking furnaces. Natural gas liquids can be fed directly to the furnaces from pipelines. The effluent from the cracking furnaces is directed through heat exchangers to halt the reactions and recovery energy. The stream, generally referred to as cracked gas, is then directed to the compression and fractionation step.

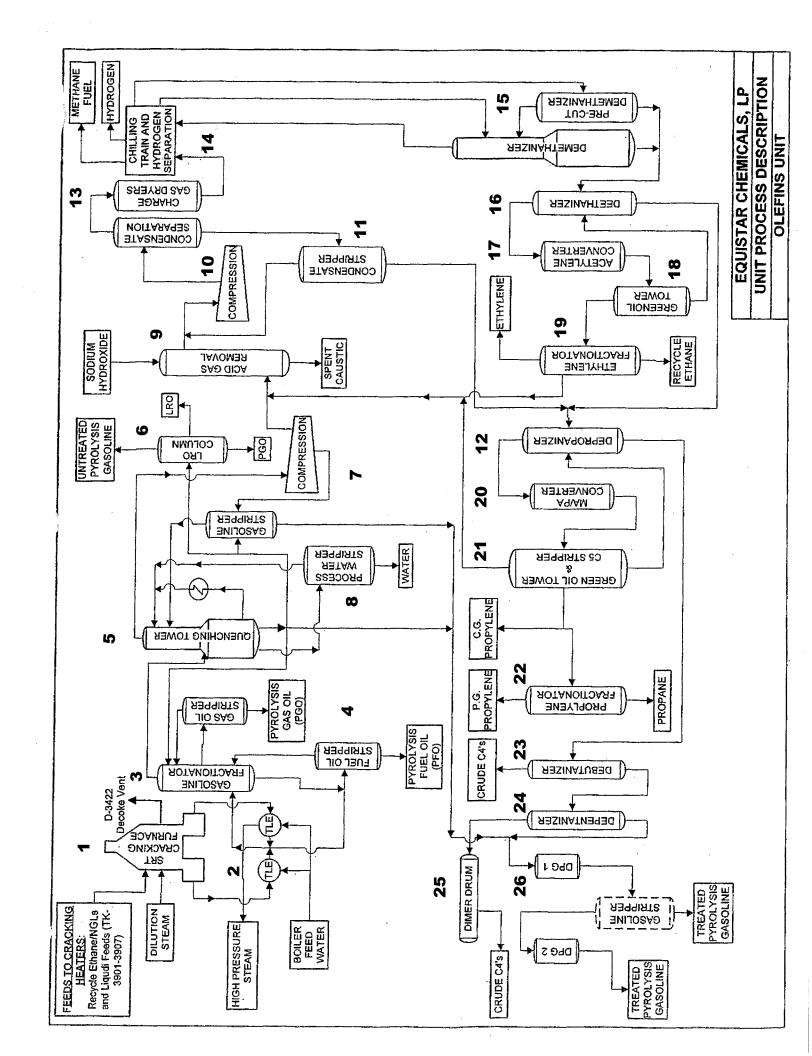
The cracked gas then goes through a series of compression and fractionation steps where the primary products, ethylene and propylene are separated from the by-products. The by-products are also fractionated into several different by-product streams, such as ethane, propane, C4 products, C5 products, pyrolysis fuel oil, pyrolysis gasoline and other higher carbon hydrocarbons. Methane and hydrogen removed from the cracked gas is used as fuel gas for the fired sources within the unit. Acetylene in the cracked gas is converted to ethylene and ethane in the Acetylene converters and methyl acetylene/propadiene (MAPD) in the cracked gas is converted to propylene and propane in the MAPD converters.

The DPG equipment processes pyrolysis gasoline feed. In the DPG equipment, the di-olefins are converted to mono-olefins. The effluent from these reactors is sent to other units at the site for further fractionated into light and heavy gasoline fractions.

The Acetylene, MAPD and DPG converters are regenerated through a common stack (The converters (EPN: 44E10) are regenerated using the Regen Heater (EPN: 47E03).

Process water is used as steam within the unit (EPNs: 44PVD4420 and 44FUGSTM). Purchased steam is also used within the unit and superheated using the Superheaters (F480001 A/B). Cooling water is supplied by a closed look system between the Cooling Tower (EPN: 48E11) and heat exchangers.

### Figure 2-1 OP2 Unit Process Flow Diagram



### SECTION 3 EMISSION CALCULATION METHODOLOGY

This section describes the methodology used to calculate Potential-to-Emit (PTE) emissions from the sources affected by this project using BACT level controls. Emissions calculations are being provided electronically per TCEQ guidance.

#### 3.1 Flare Emissions

The VOC emissions are estimated based on natural gas flow and the emission factor in EPA AP-42 for the combustion of natural gas. The flare is designed to ensure that the flares maintain compliance with NSR Permit No. 2933 and with applicable NSPS and State regulations when in use. NOx and CO emissions are estimated using emissions factors provided in TCEQ publication RG-360A/11, Appendix A: Technical Supplement, Table A-6, "Air Permit Flare Emissions Factors," revised February 2012. The unit operates a steam-assist flare to control vents from the process unit.

### **SECTION 4**

### BEST AVAILABLE CONTROL TECHNOLOGY AND LOWEST ACHIEVABLE EMISSION REDUCTION

In accordance with 30 TAC Chapter 116, §116.111(a)(2)(C), any new or modified facility must utilize BACT, with consideration given to the technical practicability and economic reasonableness of reducing or eliminating the emissions from the facility. Below is a BACT and LAER evaluation of the OP2 Unit flare.

#### 4.1 Flare

The flare meets at least 98% destruction efficiency (DRE) for organic compounds and 99% DRE for organic compounds with 3 carbon or less, which meets BACT. The emission factors for NOx and CO emissions from a steam-assisted flare were used and meet BACT for CO and LAER for NOx. The EPA RACT/BACT/LAER Clearinghouse identified LAER for NOx to be operating flare with good combustion practices in compliance with 40 CFR 60.18 and/or 40 CFR 63.11. The TCEQ published 0.068 lb/MMBtu NOx factor for low BTU steam-assisted flares was the lowest reported emission factor for an elevated flare during the last 10 years. A copy of the results of the Clearinghouse search is attached.

### SECTION 5 REGULATORY APPLICABILITY

Pursuant to TCEQ 30 TAC §116.111, Equistar will meet all rules and regulations of the TCEQ and the intent of the TCAA for the emission sources and activities addressed in this permit amendment application, as follows:

- ➤ §116.111(a)(1) A completed Form PI-1 has been signed by an authorized representative of Equistar and is included in Appendix A.
- $\gt$  §116.111(a)(2)(A) through (L) These items are addressed individually below.
- > §116.111(b) Equistar will comply with applicable 30 TAC 39 and 30 TAC 55 public notice and public participation requirements for this permit amendment application.

#### 5.1 General Application Requirements - §116.111

The emissions associated with the proposed OP2 Unit project will comply with all applicable air quality rules and regulations and with the intent of the TCAA, including protection of the health and the physical property of people, as required by §116.111(a)(2)(A)(i). Following is a summary of rules and regulations as they apply to the proposed project:

<u>30 TAC 101 - General Rules</u>: The facility will be operated in accordance with the General Rules relating to circumvention, nuisance, traffic hazard, notification requirements for major upset, notification requirements for unplanned maintenance, sampling, sampling ports, emission inventory requirements, sampling procedures and terminology, compliance with Environmental Protection Agency (EPA) Standards, emissions fees, and all other applicable General Rules.

- <u>30 TAC 111 Visible Emissions and Particulate Matter</u>: Equistar will comply with all applicable requirements under this chapter.
- <u>30 TAC 112 Sulfur Compounds</u>: Equistar will comply with all applicable requirements under this chapter.
- <u>30 TAC 113 Toxic Materials</u>: TCEQ has incorporated MACT standards (40 CFR 63) into Chapter 113 by reference. The proposed facility will comply with all applicable provisions of Chapter 113 concerning control, recordkeeping, reporting, and monitoring requirements.
- <u>30 TAC 114 Motor Vehicles</u>: This provision of the rule controls the emissions from motor vehicles and does not apply to the facilities under consideration in this permit application.
- <u>30 TAC 115 Volatile Organic Compounds</u>: The proposed facility is located in Harris County and is regulated by the following Rules that are applicable to this permit application:

Subchapter B Division 2 – Vent Gas Control

Equistar will comply with all the applicable control, monitoring, testing, and recordkeeping requirements listed in this subchapter.

<u>30 TAC 116 - Permits for New Construction or Modification</u>: Equistar is complying with the requirements of Chapter 116 by submitting this permit application and as outlined below for each of the following sections:

#### Rule 116.111(a)(2)(A) Protection of public health and welfare

As outlined below, the emissions from Equistar will comply with all air quality rules and regulations and with the intent of the TCAA, including protection of the health and physical property of the people.

#### Rule 116.111(a)(2)(B) Measurement of Emissions

The proposed facility will have provisions for measuring the emission of significant air contaminants as determined by the Executive Director.

#### Rule 116.111(a)(2)(C) Best Available Control Technology (BACT)

Section 4 of this application presents a discussion of BACT for the modified facilities associated with this application.

#### Rule 116.111(a)(2)(D) Federal New Source Performance Standards (NSPS)

Equistar will comply with all applicable 40 CFR Part 60 controls, recordkeeping, reporting, and monitoring requirements.

#### Rule 116.111(a)(2)(E) National Emission Standards for HAPs (NESHAP)

Equistar will comply with all applicable 40 CFR Part 61 controls, recordkeeping, reporting, and monitoring requirements.

#### Rule 116.111(a)(2)(F) Maximum Achievable Control Technology (MACT)

Equistar will comply with all applicable 40 CFR Part 63 controls, recordkeeping, reporting, and monitoring requirements.

#### Rule 116.111(a)(2)(G) Performance Demonstration

The proposed facilities are expected to perform as represented in this application.

#### Rule 116.111(a)(2)(H) Nonattainment Review

The facility is located in a nonattainment area for VOC and NO<sub>x</sub>. See Section 1.4, PSD and Non-attainment Review, for details.

#### Rule 116.111(a)(2)(I) Prevention of Significant Deterioration (PSD) review

The facility is located in an attainment area for SO2, PM10, CO, and lead.

See Section 1.4, PSD and Non-attainment Review, for details.

#### Rule 116.111(a)(2)(J) Air Dispersion Modeling

Air dispersion modeling is being submitted with this application.

#### Rule 116.111(a)(2)(K) Hazardous Air Pollutants

Equistar will comply with all applicable requirements under Subchapter E of this chapter.

#### Rule 116. 111(a)(2)(L) Mass Cap and Trade Allowances

Equistar Channelview Facility is located in the Houston/Galveston/Brazoria area. Equistar has sufficient NOx allowances to demonstrate compliance with the mass emissions cap and trade program.

<u>30 TAC 117 - Nitrogen Compounds</u>: The provision of the rule does not apply to the proposed facilities considered in this permit application.

<u>30 TAC 118 - Air Pollution Episodes</u>: The facility will be operated in compliance with the rules relating to generalize a localized air pollution episode. An Emissions Reduction Plan is maintained as required by §118.5.

<u>30 TAC 122 - Federal Operating Permits:</u> The Channelview Facility operates under Federal Operating Permit No. O1426. The Title V Permit will be revised to reference the changes in applicable requirements resulting from the amendment to the NSR permit.

# APPENDIX A ADMINISTRATIVE CONSIDERATIONS AND APPLICATION FORMS

#### **Permit Fee Calculation**

The amendment application fee is calculated according to 30 TAC §116.141(a), Determination of Fees, which specifies that the fee for an amendment is based on the capital cost of the project. The permit application fee is calculated and summarized on the TCEQ Table 30 included in the NSR Workbook.

The permit amendment fee of \$3,000 is provided with this application. The fee payment tracer number for the total amount including both fees is included in this appendix.

#### **Compliance History**

Equistar is an existing site greater than 5-years old. Equistar requests that TCEQ compile the history of the site.

#### **Administratively Application Forms**

The administrative information has been completed in the NSR Workbook and sent electronically to the Air Permit Initial Review Team. Additional the project EMEW for SCREEN workbook containing the modeling review information has been provided electronically.

Date: <u>10/01/2019</u>
Permit #: <u>2933</u>
Company: <u>Equistar</u>

	I. Ap	plicant Information		
I acknowledge that I am subm	itting an authorize	d TCEQ application workbook	and any	
		requested data and adjusting		
-		olication workbook in any way,	_	I agree
not limited to changing formul				
A. Company Information		•		
Campany and anal Name		Familiator Chamiliana I. D.		
Company or Legal Name:		Equistar Chemicals, LP		
Permits are issued to either the	facility owner or ope	erator, commonly referred to as th	ne applicant or pe	ermit holder. List
		rship, or person who is applying f		
legal name with the Texas Secre	etary of State at (51	2) 463-5555 or at:		
https://www.sos.state.tx.us				
Texas Secretary of State Charte	r/Registration			
Number (if given):	-			
B. Company Official Contact II	nformation: must r	not be a consultant		
Prefix (Mr., Ms., Dr., etc.):	Mrs.			
First Name:	Kim			
Last Name:	Foley			
Title:	Site Manager			
Mailing Address:	PO Box 777			
Address Line 2:				
City:	Channelview			
State:	Texas			
ZIP Code:	77530			
Telephone Number:	281-862-5150			
Fax Number:				
Email Address:	kim.foley@lyb.c	om		
C. Technical Contact Informat		ust have the authority to make bir	nding agreement	s and
	-	be a consultant. Additional tech		
provided in a cover letter.				
Prefix (Mr., Ms., Dr., etc.):	Mrs.			
First Name:	Teresa			
Last Name:	Peneguy			
Title:	<b>Environmental F</b>	Permitting		
Company or Legal Name:	LyondellBasell			
Mailing Address:	PO Box 777			
Address Line 2:				
City:	Channelview			
State:	Texas			
ZIP Code:	77503			
Telephone Number:	281-452-8330			
Fax Number:				
Email Address:	teresa.peneguy(	@lyb.com		
D. Assigned Numbers	•			
The CN and RN below are assig	ned when a Core D	Data Form is initially submitted to	the Central Regis	stry. The RN is
		stigation or if the agency has issu		
		hese questions blank and include	e a Core Data Fo	rm with your
application submittal. See Section	on VI.B. below for a	dditional information.		
Enter the CN. The CN is a uniqu	e number given to	each business, governmental		
body, association, individual, or	other entity that ow	ns, operates, is responsible for,	600124705	

Version 4.0 Page 1

or is affiliated with a regulated entity.

Date: <u>10/01/2019</u>
Permit #: <u>2933</u>
Company: <u>Equistar</u>

Enter the RN. The RN is a unique agency assigned number given to each person,
organization, place, or thing that is of environmental interest to us and where
regulated activities will occur. The RN replaces existing air account numbers. The
RN for portable units is assigned to the unit itself, and that same RN should be used
when applying for authorization at a different location.

100542281

#### II. Delinquent Fees and Penalties

Does the applicant have unpaid delinquent fees and/or penalties owed to the TCEQ? This form will not be processed until all delinquent fees and/or penalties owed to 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. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at:

No

https://www.tceq.texas.gov/agency/financial/fees/delin

#### **III. Permit Information**

#### A. Permit and Action Type (multiple may be selected, leave no blanks)

Additional information regarding the different NSR authorizations can be found at: https://www.tceq.texas.gov/permitting/air/guidance/authorize.html

Select from the drop-down the type of action being requested for each permit type. If that permit type does not apply, you MUST select "Not applicable".

Provide all assigned permit numbers relevant for the project. Leave blank if the permit number has not yet been assigned.

Permit Type	Action Type Requested	Permit Number (if assigned)
	(do not leave blank)	
Minor NSR (can be a Title V major source): Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Relocation/Alteration, Change of Location, Alteration, Extension to Start of Construction	Amendment	2933
Special Permit: Not applicable, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction	Not applicable	
De Minimis: Not applicable, Initial	Not applicable	
Flexible: Not applicable, Initial, Amendment, Renewal, Renewal Certification, Renewal/Amendment, Alteration, Extension to Start of Construction	Not applicable	
PSD: Not applicable, Initial, Major Modification	Not applicable	
Nonattainment: <i>Not applicable, Initial, Major Modification</i>	Major Modification	N140
HAP Major Source [FCAA § 112(g)]: <i>Not</i> applicable, <i>Initial, Major Modification</i>	Not applicable	
PAL: Not applicable, Initial, Amendment, Renewal, Renewal/Amendment, Alteration	Not applicable	
GHG PSD: Not applicable, Initial, Major Modification, Voluntary Update	Not applicable	

Date: 10/01/2019
Permit #: 2933
Company: Equistar

B. MSS Activities	ı		
How are/will MSS activities for sources associated with this project be authorized?	Combination (lis	t below)	
List the permit number, registration number, and/or PBR number.		83799, 106.263	
C. Consolidating NSR Permits			
Will this permit be consolidated into another NSR p	ermit with this ac	tion?	No
Will NSR permits be consolidated into this permit w	ith this action?		No
D. Incorporation of Standard Permits, Standard	Exemptions, an	d/or Permits By Rule (PBR)	
To ensure protectiveness, previously issued author	izations (standar	d permits, standard exemptions,	
including those for MSS, are incorporated into a pe			
and/or amendment, consolidation (in some cases) regarding incorporation can be found in 30 TAC § 1			
legarding incorporation can be found in 60 17.6 g	10.110(a)(2), 00	17.0 3 170.0 10(0) and in this me	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
https://www.tceq.texas.gov/assets/public/permitting	/air/memos/pbr	spc06.pdf	
Are there any standard permits, standard exemption		No	
be incorporated by reference?			
Are there any PBR, standard exemptions, or standard	ard permits		
associated to be incorporated by consolidation? No			
calculations, a BACT analysis, and an impacts anal	•	No	
attached to this application at the time of submittal for any authorization to be incorporated by consolidation.			
E. Associated Federal Operating Permits			

Date: _	_ <u>10/01/2019</u> _
Permit #:	<u>2933</u>
Company:	Equistar

	General	Company: <u>Equi</u>		
Is this facility located at a site required to obtain a s	site operating permit (SOP) or general			
operating permit (GOP)?	one operating permit (e.e. ) or general	Yes		
Is a <b>SOP</b> or <b>GOP</b> review pending for this source, at	rea or site?	Yes		
If required to obtain a <b>SOP</b> or <b>GOP</b> , list all		1 00		
associated permit number(s). If no associated				
permit number has been assigned yet, enter	O1426			
"TBD":				
IV. Facility Loc	ation and General Information			
A. Location				
County: Enter the county where the facility is	Horrio			
physically located.	Harris			
TCEQ Region	Region 12			
County attainment status as of Sept. 23, 2019	Serious Ozone nonattainment			
Street Address:	8280 Sheldon Road			
City: If the address is not located in a city, then				
enter the city or town closest to the facility, even if	Channelview			
it is not in the same county as the facility.				
ZIP Code: Include the ZIP Code of the physical				
facility site, not the ZIP Code of the applicant's	77530			
mailing address.				
Site Location Description: If there is no street				
address, provide written driving directions to the				
site. Identify the location by distance and direction				
from well-known landmarks such as major highway	way			
intersections.				
Use USGS maps, county maps prepared by the Te	xas Department of Transportation, or an online s	oftware		
application such as Google Earth to find the latitude	e and longitude.			
Latitude (in degrees, minutes, and nearest second				
(DDD:MM:SS)) for the street address or the				
destination point of the driving directions. Latitude	020:40:56			
is the angular distance of a location north of the	029:49:56			
equator and will always be between 25 and 37				
degrees north (N) in Texas.				
Longitude (in degrees, minutes, and nearest				
second (DDD:MM:SS)) for the street address or				
the destination point of the driving directions.	005-00-40			
Longitude is the angular distance of a location	095:06:43			
west of the prime meridian and will always be				
between 93 and 107 degrees west (W) in Texas.				
Is this a project for a lead smelter, concrete crushir	ng facility, and/or a hazardous waste managemen	t		
facility?		No		
B. General Information	To			
Site Name:	Channelview Facility			
Area Name: Must indicate the general type of				
operation, process, equipment or facility. Include				
numerical designations, if appropriate. Examples	Olefins Unit			
CALE SUBTRIC ACID PLANT AND NO 6 STARM KOHON	, - · - · · · · · · · · · · · · · · · ·			

Version 4.0 Page 4

Vague names such as Chemical Plant are not

acceptable.

Date: <u>10/01/2019</u>
Permit #: <u>2933</u>
Company: <u>Equistar</u>

Are there any schools located within 3,000 feet of the site boundary?		Yes				
C. Portable Facility						
Permanent or portable facility?		Permanent				
D. In december Trans						
D. Industry Type		SOCMI Chemicals				
Principal Company Product/Busine A list of SIC codes can be found at		SOCIMI Chemicais				
https://www.naics.com/sic-codes-ir		ı				
Principal SIC code:	idusti y-di ilidowii	<u></u>				
NAICS codes and conversions bet	Ween NAICS and					
https://www.census.gov/eos/www/r		d Olo Codes are available at.				
Principal NAICS code:	<u>Idio3/</u>	325199				
E. State Senator and Representa	tive for this site					
		is not compatible to Internet Explorer):	_			
https://wrm.capitol.texas.gov/						
State Senator:		John Whitmire				
District:		15				
State Representative:		Ana Hernandez				
District:		143				
	V. F	Project Information				
A. Description						
Provide a brief description of the						
project that is requested. (Limited	Natural gas is b	eing added to flare to meet furture regulatory fl	eing added to flare to meet furture regulatory flame zone heat			
to 500 characters).	value requireme		ame zone neat			
	value requireme	The for fidings.				
B. Project Timing						
		before beginning construction. Construction is b				
as anything other than site clearan	ce or site prepar	ration. Enter the date as "Month Date, Year" (e.	g. July 4, 1776).			
	TDD					
Projected Start of Construction: TBD						
Projected Start of Operation:	TBD					
C. Enforcement Projects	r rolated to an a	agonov investigation, nation of violation, or				
enforcement action?	i relateu to, an a	agency investigation, notice of violation, or	No			
emoreement action:						
D. Operating Schedule						
Will sources in this project be authorized to operate 8760 hours per year?  Yes						

### VI. Application Materials

All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. (30 TAC § 116.116)

#### A. Confidential Application Materials

Date: 10/01/2019
Permit #: 2933
Company: Equistar

Is confidential information submitted with this application?	No			
B. Is the Core Data Form (Form 10400) attached?	No			
https://www.tceq.texas.gov/assets/public/permitting/centralregistry/10400.docx				
C. Is a current area map attached?	Yes			
Is the area map a current map with a true north arrow, an accurate scale, the entire plant property,				
the location of the property relative to prominent geographical features including, but not limited to,	Yes			
highways, roads, streams, and significant landmarks such as buildings, residences, schools, parks, hospitals, day care centers, and churches?	100			
Does the map show a 3,000-foot radius from the property boundary?	Yes			
D. Is a plot plan attached?	Yes			
Does your plot plan clearly show a north arrow, an accurate scale, all property lines, all emission				
points, buildings, tanks, process vessels, other process equipment, and two bench mark locations?	Yes			
Does your plot plan identify all emission points on the affected property, including all emission points				
authorized by other air authorizations, construction permits, PBRs, special permits, and standard permits?	Yes			
Did you include a table of emission points indicating the authorization type and authorization				
identifier, such as a permit number, registration number, or rule citation under which each emission point is currently authorized?				
E. Is a process flow diagram attached?	Yes			
Is the process flow diagram sufficiently descriptive so the permit reviewer can determine the raw				
materials to be used in the process; all major processing steps and major equipment items;				
individual emission points associated with each process step; the location and identification of all	Yes			
emission abatement devices; and the location and identification of all waste streams (including				
wastewater streams that may have associated air emissions)?				
F. Is a process description attached?	Yes			
Does the process description emphasize where the emissions are generated, why the emissions				
must be generated, what air pollution controls are used (including process design features that	Yes			
minimize emissions), and where the emissions enter the atmosphere?				
Does the process description also explain how the facility or facilities will be operating when the maximum possible emissions are produced?	Yes			
<u> </u>				
G. Are detailed calculations attached? Calculations must be provided for each source with new or changing emission rates. For example, a new source, changing emission factors,				
decreasing emissions, consolidated sources, etc. You do not need to submit calculations for				
sources which are not changing emission rates with this project. Please note: the preferred	Yes			
format is an electronic workbook (such as Excel) with all formulas viewable for review. It can				
be emailed with the submittal of this application workbook.				
Are emission rates and associated calculations for planned MSS facilities and related activities	Yes			
attached?				
H. Is a material balance (Table 2, Form 10155) attached?	Yes			

Date: 10/01/2019
Permit #: 2933
Company: Equistar

I. Is a list of MSS activities attached?			
J. Is a discussion of state regulatory requirements attached, addressing 30 TAC Chapters 101, 111, 112, 113, 115, and 117?	Yes		
For all applicable chapters, does the discussion include how the facility will comply with the requirements of the chapter?	Yes		
For all not applicable chapters, does the discussion include why the chapter is not applicable?	Yes		
K. Are all other required tables, calculations, and descriptions attached?	Yes		

#### VII. Signature

The owner or operator of the facility must apply for authority to construct. The appropriate company official (owner, plant manager, president, vice president, or environmental director) must sign all copies of the application. The applicant's consultant cannot sign the application. **Important Note: Signatures must be original in ink, not reproduced by photocopy, fax, or other means, and must be received before any permit is issued.** 

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382; the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name:	Kim Foley
Signature:	
	Original signature is required.
Date:	



### Basis2 Receipt Report by Endorsement Number

NOV-18-19 04:37 PM

Acct. #: PAF	Accoun	t Name:	PERMIT AMENDMENT FEES (AIR)						
Paid For	Endors. #	Ref #2	Paid In By	PayTyp	Chk #	Card#	Bank Slip	Tran.Date	Receipt Amnt.
OLEFINS 2	WRS0019807	2933	LYO EQUISTAR CHE	WT	WIRE		BS00076778	18-NOV-19	\$3000.00

Report\_ID: Page 1

#### Form APD-EXP Expedited Permitting Request

I. Contact Information
Company or Other Legal Customer Name: Equistar Chemicals, LP
Customer Reference Number (CN): 600124705
Regulated Entity Number (RN): 100542281
Company Official or Technical Contact Name: Teresa Peneguy
Phone Number: 281-452-8330
Email: teresa.peneguy@lyb.com
II. Project Information
Facility Type: Channelview Facility, OP2 Unit
Permit Number: 2933
Project Number: TBD
III. Economic Justification
The purpose of the application associated with this request to expedite will benefit the economy of this state or an area of this state.
IV. Delinquent Fees and Penalties
Applications will not be expedited if any delinquent fees and/or penalties are owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/delin/index.html.
V. Signature
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. As the applicant, I commit to fulfilling all expectations of the expedited permitting program and application requirements promptly. Failure to meet any expectation or requirement may cause my application to be removed from the expedited permitting program and possibly voided at the discretion of the TCEQ Executive Director. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.
Name: Teresa Peneguy
Signature: Ques Dev
Date: 11/8/2019

**Reset Form** 



#### Basis2 Receipt Report by Endorsement Number

NOV-18-19 04:36 PM

Acct. #: APS Account Name: AIR PERMIT EXPEDITED FEE

Paid For Endors. # Ref #2 Paid In By PayTyp Chk # Card# Bank Slip Tran.Date Receipt Amnt. 2933/OLEFINS 2 WRS0019800 WIRE BS00076778 \$20000.00 LYO EQUISTAR CHE WT 18-NOV-19

Report\_ID: Page 1

### APPENDIX B TECHNICAL APPLICATION TABLES

#### **Technical Application Tables**

The following table is included in this appendix:

Table 2F – Project Increases

### TABLE 2F PROJECT EMISSION INCREASE

Pollutant <sup>1</sup> :	Nox		Permit:	2933
Baseline Period:	N/A new stream	to		

Affected or Modified Facilities <sup>2</sup>		Permit No.	A - 1 - 1 - 1 - 1 - 1 - 3	Baseline	Proposed	Project Actual	Difference (B-	67	Project	
	FIN	EPN	Permit No.	Actual Emissions <sup>3</sup>	Emissions <sup>4</sup>	Emissions <sup>5</sup>	Emissions	A) <sup>6</sup>	Correction <sup>7</sup>	Increase <sup>8</sup>
1.	48E01	48E01	2933	0	0	5.73	5.73	5.73		5.73
2.										
3.										
4.										
5.										
6.										
7.										
8.										
9.										
	Page Subtotal <sup>9</sup>									5.73

<sup>&</sup>lt;sup>1</sup> Individual Table 2F=s should be used to summarize the project emission increase for each criteria pollutant

Correct actual emissions for currently applicable rule or permit requirements, and periods of non-compliance. These corrections, as well as any MSS previously

Correction made to emission increase for what portion could have been accommodated during the baseline period. The justification and basis for this estimate must be

<sup>&</sup>lt;sup>2</sup> Emission Point Number as designated in NSR Permit or Emissions Inventory

<sup>&</sup>lt;sup>3</sup> All records and calculations for these values must be available upon request

<sup>&</sup>lt;sup>4</sup> demonstrated under 30 TAC 101, should be explained in the Table 2F supplement

<sup>&</sup>lt;sup>5</sup> If projected actual emission is used it must be noted in the next column and the basis for the projection identified in the Table 2F supplement

<sup>&</sup>lt;sup>6</sup> Proposed Emissions (column B) minus Baseline Emissions (column A)

<sup>&</sup>lt;sup>7</sup> provided in the Table 2F supplement

<sup>&</sup>lt;sup>8</sup> Obtained by subtracting the correction from the difference. Must be a positive number.

<sup>&</sup>lt;sup>9</sup> Sum all values for this page.

#### APPENDIX C EMISSION CALCULATIONS

Included in this appendix is the emissions calculations for the additional natural gas to the flare.

#### Flare Emissions Natural Gas addition

**Emission Factors** 

NOx 0.068 lb/MMBtu TCEQ El Guidance for Steam-assist flare
CO 0.3503 lb/MMBtu TCEQ El Guidance for Steam-assist flare

SO2 5 gr/100 dscf vendor spec

2.5 gr/100 dscf historically used factor
VOC 5.5 lb/MMscf AP-42 Natural Gas Combustion

1020 Btu/scf

EPN: 48E01

Avg Natural Gas 89,741 scfh Max Natural Gas 240,000 scfh

Max Hourly	Current Auth	Nat Gas Increase	Total
IVIAX FIGUREY	lb/hr	lb/hr	lb/hr
NOx	189.68	16.65	206.33
CO	974.53	85.75	1060.28
SO2		3.43	
VOC	977.09	1.32	978.41

Annual	Current Auth	Nat Gas Increase	Total
Aililuai	tpy	tpy	tpy
NOx	15.8	5.73	21.53
CO	144.75	29.49	174.24
SO2	4.02	2.81	6.83
VOC	41.68	2.16	43.84

Sample Calculation

Hourly NOx

240,000 scf	1020 Btu	MMBtu	0.068 lb	=	16.65 lb NOx
hr	scf	10^6 Btu	MMBtu		hr

Annual SO2

89,741 scf	MMscf	2.5 gr	lb S	2 lb SO2	8760 hr	ton	=	2.81 ton SO2	
hr	10^6 scf	100 dscf	7000 gr	lb S	vr	2000 lb	-	hr	-

SO2 existing hourly convert to 5 S grain/ 100 dscf basis

current auth	5 gr
2.5 gr / 100 dscf	100 dscf

Unit	Permit before SP	Factor current	Current lb,	Current tp	Revised lb/hr	Revised tpy
OP2	2933	2.5 gr/100 dscf	15.12	4.02	30.24	4.02
Add Nat Gas		5 gr/100 dscf			3.43	2.81
			15.12	4.02	33.67	6.83

	lb/hr
Current Auth	15.12
Increase	18.55
Proposed Allowable	33.67

Date: \_10/01/2019\_ Permit #: \_\_2933\_\_\_ Company: \_Equistar\_\_\_

I. Additio	I. Additional Questions for Specific NSR Minor Permit Actions						

Date: \_10/01/2019\_ Permit #: \_\_2933\_\_\_ Company: \_Equistar\_\_\_

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

Date: \_10/01/2019\_ Permit #: \_\_2933\_\_\_ Company: \_Equistar\_\_\_

V. Nonattainment Permits	
	V
Complete the offsets section of the Federal Applicability sheet of this workbook.	Yes
Does the application contain a detailed LAER analysis? (attachment or as notes on the BACT sheet of this workbook)	Yes
Does the application contain an analysis of alternative sites, sizes, production processes, and control techniques for the proposed source? The analysis must demonstrate that the benefits of the proposed location and source configuration significantly outweigh the environmental and social costs of that locati+A124on.	Yes

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_ Company: \_Equistar\_\_\_

#### VIII. Federal Regulatory Questions

Indicate if any of the following requirements apply to the proposed facility. Note that some federal regulations apply to minor sources. Enter all applicable Subparts.

#### A. Title 40 CFR Part 60

Date: _	_10/01/2019_
Permit #:	2933
Company:	_Equistar

Do NSPS subpart(s) apply to a	Yes									
facility in this application?	1.00									
List applicable subparts you will										
demonstrate compliance with	A, K, Ka, Kb, VV, NNN									
(e.g. Subpart M)										
B. Title 40 CFR Part 61										
Do NESHAP subpart(s) apply to a	Yes									
facility in this application?	100									
List applicable subparts you will										
demonstrate compliance with	A, FF, V									
(e.g. Subpart BB)	,,,,,,,									
C. Title 40 CFR Part 63										
Do MACT subpart(s) apply to a	Yes									
facility in this application?	100									
List applicable subparts you will										
demonstrate compliance with	A, F, G, H, YY, FFFF, DDDDD, Z	777								
(e.g. Subpart VVVV)	, , , , , , , , , , , , , , , , , , , ,	<del></del>								
	IX. Emissions Revie	₩								
A. Impacts Analysis			. 19							
Any change that results in an incre										
impacts demonstration. Information application and show compliance was										
necessary to make the demonstrate		•	e inionnation							
•	<u> </u>	CO THIS WORKDOOK.	lv.							
Does this project require an impac	is analysis?		Yes							
B. Disaster Review	ufficient acceptition of contain about	uicala vulaiala if valanand annidout	ally was dal							
If the proposed facility will handle scause off-property impacts that co										
required as part of the application.										
Additional Guidance can be found		Thicking section for assistance at (	012) 200-1200.							
		O								
https://www.tceq.texas.gov/assets	•									
Does this application involve any a	ir contaminants for which a disast	er review is required?	No							
C. Air Pollutant Watch List										
	contrations of apositic pollutants	that are of concern. The TCEO h	as designated							
Certain areas of the state have conthese portions of the state as water	•		-							
restrictions on emissions of the aff										
and pollutants of interest can be fo	. , ,	pormit requirements. The location								
· ·										
			No							
is the proposed facility located in a	https://www.tceq.texas.gov/toxicology/apwl/apwl.html s the proposed facility located in a watch list area?  No									
	watch list area?		INO							
	watch list area?		140							
	watch list area?		INO							
D. Mass Emissions Cap and Tra			INC							
D. Mass Emissions Cap and Trades Is this facility located at a site within	de	nment area (Brazoria,								
<del>-</del>	<b>de</b> n the Houston/Galveston nonattai	•	Yes							
Is this facility located at a site with	<b>de</b> n the Houston/Galveston nonattai Harris, Liberty, Montgomery, and \	Waller Counties)?								
Is this facility located at a site with Chambers, Fort Bend, Galveston,	<b>de</b> n the Houston/Galveston nonattai Harris, Liberty, Montgomery, and \	Waller Counties)?	Yes							

Date: _	_10/01/2019_
Permit #:	2933
Company:	_Equistar

Permit primary industry (must be selected for workbook to function)

Action Requested (only I action per FIN)	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Term (lb/hr)	Proposed Long- Term (tpy)	Short-Term Difference (lb/hr)	Long-Term Difference (tpy)	Unit Type (Used for reviewing BACT and Monitoring Requirements)
lot New/Modified	Yes	F44E00	F44E00	Olefins II Unit Fugitives	VOC	94.85	406.82	0	0	Fugitives: Piping and Equipment Leak
ot New/Modified	Yes	44FGWATER	44FGWATER	OP-II Wastewater	voc	1.15	5.03	0	0	Wastewater
ot New/Modified	Yes	OP2FUGEXP	EOP2FUGEXP	Fugitives OP2 Fugitives	VOC	0.46	2.01	0	0	Fugitives: Piping and Equipment Leak
ot New/Modified	Yes	44E08	44E08	Decoke Vent	co	132	113.75	0	0	Process Vent
ot New/Modified	Yes	44200	44200	Decoke Vent	PM	36	6.5	0	0	1 100c33 VCIII
ot New/Modified	Yes				PM10	36	6.5	0	0	
ot New/Modified	Yes				PM2.5	36	6.5	0	0	
ot New/Modified	Yes				VOC	0.11	0.1	0	0	
ot New/Modified	Yes	OP2DECOKE2	EOP2DECOKE2	Decoke Vent 2	со	310	59.6	0	0	Process Vent
ot New/Modified	Yes				VOC	0.08	0.02	0	0	
ot New/Modified ot New/Modified	Yes Yes				PM PM10	1.07	0.1 0.1	0	0	
ot New/Modified	Yes				PM2.5	1.07	0.1	0	0	
				Reactor Regeneration						
ot New/Modified	Yes	44E10	44E10	Vent	со	82.98	16.55	0	0	Process Vent
ot New/Modified	Yes			VOIL	VOC	2	0.17	0	0	
ot New/Modified	Yes				SO2	8.26	2.12	0	0	
lot New/Modified	Yes	44HTHTRS	44HTHTRS	Pyrolysis and Steam Production Common Stack Cracking Heaters: F-4401 - F-4415; F- 4418; F-4419 Common Stack Steam Super Heaters: F480001 A/B	NOx	494.76	2021.19	0	0	Furnace
ot New/Modified	Yes				СО	395.23	1611.75	0	0	
ot New/Modified	Yes				SO2	33.84	138.13	0	0	
ot New/Modified	Yes				PM	37.6	153.48	0	0	
ot New/Modified	Yes				PM10	37.6	153.48	0	0	
ot New/Modified	Yes				PM2.5	37.6	153.48	0	0	
ot New/Modified ot New/Modified	Yes	44HTHTRS	F4401 / F4402	Constitue Handana	VOC	24.97	99.15	0	0	Commence
	No No	44HTHTRS	F4401 / F4402	Cracking Heaters Cracking Heaters				0	0	Furnace Furnace
	No	44HTHTRS	F4405 / F4406	Cracking Heaters				0	0	Furnace
	No	44HTHTRS	F4407 / F4408	Cracking Heaters				0	0	Furnace
	No	44HTHTRS	F4409 / F4410	Cracking Heaters				0	0	Furnace
	No	44HTHTRS	F4411 / F4412	Cracking Heaters				0	0	Furnace
ot New/Modified	No	44HTHTRS	F4413 / F4414	Cracking Heaters				0	0	Furnace
	No	44HTHTRS	F4418	Cracking Heaters				0	0	Furnace
	No	44HTHTRS	F4415	Cracking Heaters				0	0	Furnace
ot New/Modified	No	44HTHTRS	F48001 A/B	Superheaters				0	0	Heater
ot New/Modified	Yes	EF4419	EF4419	Expansion Heater: EF4419	NOx	38.4	25.71	0	0	Furnace
ot New/Modified	Yes				CO	33.8	148.38	0	0	
ot New/Modified	Yes				SO2	0.38	1.54	0	0	
ot New/Modified	Yes				PM PM40	4.23	17	0	0	
ot New/Modified ot New/Modified	Yes Yes				PM10 PM2.5	4.23 4.23	17 17	0	0	
ot New/Modified	Yes				NH3	2.69	11.78	0	0	
ot New/Modified	Yes				VOC	0.64	2.57	0	0	
ot New/Modified	Yes	46E05	46E05	Regeneration Heater F4601	NOx	2.5	2.63	0	0	Heater
ot New/Modified	Yes				СО	2.1	2.21	0	0	
ot New/Modified	Yes				SO2	0.18	0.19	0	0	
ot New/Modified	Yes				VOC	0.13	0.13	0	0	
ot New/Modified	Yes				PM	0.2	0.21	0	0	
ot New/Modified	Yes				PM10	0.2	0.21	0	0	
ot New/Modified ot New/Modified	Yes Yes	43E04	43E04	Regeneration Heater I	PM2.5 NOx	1.3	0.21 5.69	0	0	Heater
				F4351						
ot New/Modified	Yes				CO	1.09	4.78	0	0	
ot New/Modified ot New/Modified	Yes				SO2	0.09	0.41	0	0	
ot New/Modified	Yes Yes				PM PM10	0.1	0.46 0.46	0	0	
ot New/Modified	Yes				PM2.5	0.1	0.46	0	0	
ot New/Modified	Yes				VOC	0.07	0.28	0	0	
ot New/Modified	Yes	43HTF4360	43E06	DP Heater F4360	NOx	1.6	7.01	0	0	Heater
ot New/Modified	Yes				СО	1.34	5.89	0	0	
ot New/Modified	Yes Yes				SO2 PM	0.12	0.5	0	0	
ot New/Modified						0.13	0.56	0	0	

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

Action Requested (only 1 action per FIN)	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Proposed Short Term (lb/hr)	Proposed Long- Term (tpy)	Short-Term Difference (lb/hr)	Long-Term Difference (tpy)	Unit Type (Used for reviewing BACT and Monitoring Requirements)
Not New/Modified	Yes				PM2.5	0.13	0.56	0	0	
Not New/Modified	Yes	10=11			VOC	0.08	0.35	0	0	
Not New/Modified	Yes	43E11	43E11	DP Heater F4360C	NOx	1.6	7.01	0	0	Heater
Not New/Modified Not New/Modified	Yes				CO	1.34	5.89	0	0	
Not New/Modified	Yes Yes				SO2 PM	0.12 0.13	0.5 0.56	0	0	
Not New/Modified	Yes				PM10	0.13	0.56	0	0	
Not New/Modified	Yes				PM2.5	0.13	0.56	0	0	
Not New/Modified	Yes				VOC	0.08	0.35	0	0	
Not New/Modified	Yes	43E07	43E07	Regeneration Heater II F4361	NOx	0.4	1.75	0	0	Heater
Not New/Modified	Yes				CO	0.34	1.47	0	0	
Not New/Modified Not New/Modified	Yes Yes				SO2 PM	0.03	0.13	0	0	
Not New/Modified	Yes				PM10	0.03	0.14	0	0	
Not New/Modified	Yes				PM2.5	0.03	0.14	0	0	
Not New/Modified	Yes				VOC	0.02	0.09	0	0	
New/Modified	Yes	48FL4801P/F	48E01	OP2 Flare	NOx	163.46	21.53	16.65	5.73	Control: Flare
New/Modified	Yes				CO	842.37	107.94	85.75	29.49	
New/Modified	Yes				SO2	33.67	6.83	18.55	2.81	
New/Modified	Yes				VOC	978.41	43.84	1.31	2.16	
Not New/Modified	Yes	43E05	43E05	Butene Reactors Regen	co	6.92	4.98	0	0	Process Vent
Not New/Modified	Yes	45502	45500	Seel Oil Berrairie	VOC	5.86	5.54	0	0	Process Vent
Not New/Modified Not New/Modified	Yes Yes	45E02 45E07	45E02 45E07	Seal Oil Reservoir Seal Oil Reservoir	VOC	0.01 0.01	0.01 0.01	0	0	Process Vent Process Vent
Not New/Modified	Yes	48E4602	48E4602	Shelter J-4602	VOC	0.01	0.02	0	0	Process Vent
Not New/Modified	Yes	48E4603	48E4603	Shelter J-4603	VOC	0.08	0.34	0	0	Process Vent
Not New/Modified	Yes	48E4604	48E4604	Shelter J-4604	VOC	0.01	0.05	0	0	Process Vent
Not New/Modified	Yes	48E4605	48E4605	Shelter J-4605	VOC	0.01	0.01	0	0	Process Vent
Not New/Modified	Yes	48E4606	48E4606	Shelter J-4606	VOC	0.01	0.01	0	0	Process Vent
Not New/Modified	Yes	OP2VJ4607	48E4607	Shelter J-4607	VOC	0.01	0.01	0	0	Process Vent
Not New/Modified	Yes	OP2VJ48013 48E4301	OP2VJ48013 48E4301	Shelter J-48013	VOC	0.14	0.56	0	0	Process Vent
Not New/Modified Not New/Modified	Yes Yes	48E4303	48E4303	Shelter J-4301 Shelter J-4303	VOC	0.26 0.11	1.09 0.48	0	0	Process Vent Process Vent
Not New/Modified	Yes	OP2PV48055	OP2PV48055	Analyzer Vent	voc	0.08	0.35	0	0	Process Vent
Not New/Modified	Yes	48E4501A	48E4501A	Olefins (OP-2) Analyzer	voc	0.01	0.01	0	0	Process Vent
Not New/Modified	Yes	48E11	48E11	Cooling Tower	VOC	12.1	22.71	0	0	Cooling Tower
Not New/Modified	Yes				PM	7.88	34.53 17.27	0	0	
Not New/Modified Not New/Modified	Yes				PM10 PM2.5	3.94 0.02	0.07	0	0	
Not New/Modified	Yes Yes	44PVD4420	44PVD4420	Dilution Generator	VOC	1.97	1.66	0	0	Process Vent
Not New/Modified	Yes	441 VD4420	441 VD4420	1/	Acetone	0.03	0.03	0	0	1 100033 VOIII
Not New/Modified	Yes	48HTF4804A/B	48HTF4804A/B	Superheater Vents Diesel Engine-Driven	VOC	4.04	0.01	0	0	Process Vent
Not New/Modified  Not New/Modified	Yes Yes	OP2EN1	OP2EN1	Air Compressor	NOx	1.73 3.02	3.88	0	0	Engine: Internal Combustion Engine, Spark Ignited
Not New/Modified	Yes				SO2	<0.01	0.01	0	0	
Not New/Modified	Yes				PM	0.02	0.04	0	0	
Not New/Modified	Yes				VOC	0.16	0.37	0	0	
Not New/Modified	Yes				PM10	0.02	0.04	0	0	
Not New/Modified	Yes				PM2.5	0.02	0.04	0	0	
Not New/Modified	Yes	43TK4301	43E01	D-4311 NCTBP Tank	voc	22.19	0.47	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	43TK4303	43E03	D-4310 EADC Tank	voc	33.19	0.41	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	45TK4511	45E11	Antifoulant Storage Tank No. 4511	voc	0.55	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	46TK4607	46E07	Antifoulant Storage Tank No. 4607	voc	0.28	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	48TK48302	48E07	Pyrolysis Gas Oil Storage Tank No. 48302	voc	7.75	2.47	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes				Benzene	0.05	0.02	0	0	
Not New/Modified	Yes	48TK48303	48E08	Slop Oil Storage Tank	voc	0.69	2.27	0	0	Storage Tank (4): Floating roof with TVP <11.0
			1.200	No. 48303		0.62				psia
Not New/Modified	Yes				Benzene		0.16	0	0	Storage Tank (1): Fixed roof with capacity <
Not New/Modified	Yes	48TK48007	48E22	Pyrolysis Fuel Oil	voc	12.62	14.53	0	0	25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes			Pyrolysis Fuel Oil	Benzene	0.13	0.17	0	0	
Not New/Modified	Yes	48TK48304	48E20	Storage Tank No. 48304	voc	18.61	7.54	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes				Benzene	0.16	0.06	0	0	

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_ Company: \_Equistar\_\_\_

	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Proposed Short Term (lb/hr)	Proposed Long- Term (tpy)	Short-Term Difference (lb/hr)	Long-Term Difference (tpy)	Unit Type (Used for reviewing BACT and Monitoring Requirements)
Not New/Modified	Yes	48TK48305	48E21	Storage Tank No. 48305	voc	18.61	7.48	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes				Benzene	0.16	0.11	0	0	
Not New/Modified	Yes	49TK4901	49E01	Storage Tank No. 4901	voc	8.38		0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes			4301	Benzene	1.13		0	0	politi
	Yes			Storage Tank No.	H2S	<0.01		0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes	49TK4902	49E02	4902	voc	8.38		0	0	psia
Not New/Modified Not New/Modified	Yes Yes				Benzene H2S	0.27 <0.01		0	0	
Not New/Modified	Yes	49TK4903	49E03	Storage Tank No.	VOC	8.38		0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes			4903	Benzene	2.56		0	0	psia
Not New/Modified	Yes				H2S	<0.01		0	0	
Not New/Modified	Yes	49E01 to 49E03	49E01 to 49E03	Storage Tanks (3 total)	voc		36.21	0	0	Storage Tank (4): Floating roof with TVP <11.0
	Yes				Benzene		1.64	0	0	
	Yes			Storage Tank No.	H2S		0.02	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes	49TK4904	49E04	4904	VOC	6.03		0	0	psia
Not New/Modified Not New/Modified	Yes Yes				Benzene H2S	3.71 <0.01		0	0	
Not New/Modified	Yes	49TK4905	49E05	Storage Tank No. 4905	voc	6.03		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia
Not New/Modified Not New/Modified	Yes Yes				Benzene H2S	3.71 <0.01		0	0	
Not New/Modified	Yes	49TK4906	49E06	Storage Tank No.	VOC	5.81		0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes			4906	Benzene	3.31		0	0	psia
Not New/Modified	Yes				H2S	<0.01		Ō	0	
Not New/Modified	Yes	49TK4907	49E07	Storage Tank No. 4907	voc	5.12		0	0	Storage Tank (4): Floating roof with TVP <11.0 psia
Not New/Modified Not New/Modified	Yes Yes				Benzene H2S	3.39 <0.01		0	0	
Not New/Modified	Yes	40E04 to 49E07	40E04 to 49E07	Storage Tanks (4 total)			37.72	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes				Benzene		9.38	0	0	
Not New/Modified	Yes			Pyrorysis Gas Oil	H2S		0.03	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes	49TK4915	49E08	Storage Tank No.	VOC	0.32	0.33	0	0	psia
	Yes			Storage Tank No.	Benzene	<0.01	<0.01	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes	49TK4917	49E10	4917	VOC	1.84	4.03	0	0	psia
Not New/Modified  Not New/Modified	Yes	49TK4919	49E11	Light Pyrolysis Gasoline Storage Tank	VOC	0.23 1.28	2.69	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes			No. 4919	Benzene	0.41	0.89	0	0	
Not New/Modified	Yes	49TK4921	49E12	Storage Tank No. 4921	voc	2.67	2.36	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes			4921	Benzene	0.73	0.62	0	0	psia
Not New/Modified	Yes	49TK4922	49E13	Storage Tank No. 4922	voc	3.21	7.14	0	0	Storage Tank (4): Floating roof with TVP <11.0 psia
Not New/Modified	Yes			A 17 1 1 01	Benzene	2.29	5.02	0	0	0. 7 1 (1) 5: 1 ( 2)
Not New/Modified	Yes	46TK461005	OP2SMLTK08	Antifoulant Storage Tank 78482 Slop Oil Storage Tank	voc	0.77	0.05	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia  Storage Tank (1): Fixed roof with capacity <
Not New/Modified	Yes	48TK48008	48E008	48008	voc	0.39	1.7	0	0	25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes			Masteriate Teels	Benzene	0.04	0.02	0	0	Change Tank (4). Final and with an arity of
Not New/Modified	Yes	48TK48009	48E009	Wastewater Tank 48009	voc	1.03	1.84	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes			Wastewater Tank	Benzene	0.05	1.23	0	0	Storage Tank (4): Floating roof with TVP <11.0
Not New/Modified	Yes	48TK48010	48E010	Wastewater Tank 48010	voc	1.46	4.18	0	0	psia
Not New/Modified	Yes			Westernater Tonl:	Benzene	0.05	0.22	0	0	Storage Took (4): Floating roof with TVD 444.0
Not New/Modified	Yes	48TK48011	48E011	Wastewater Tank 48011	voc	2.8	7.54	0	0	Storage Tank (4): Floating roof with TVP <11.0 psia
Not New/Modified	Yes			Water Rerun Tank	Benzene	0.1	0.4	0	0	Storage Tank (1): Fixed roof with conceils
Not New/Modified	Yes	44TK4451	44E13	4451	voc	0.01	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	44TK4455	44E12	Waste Caustic Tank 4455	VOC	0.43	1.62	0	0	Storage Tank (4): Floating roof with TVP <11.0 psia
Not New/Modified	Yes				Benzene	0.07	0.27	0	0	

Date:	_10/01/2019_
Permit #:	2933
Company:	_Equistar

Action Requested (only	Include these emissions in annual (tpy) summary?	Facility ID Number (FIN)	Emission Point Number (EPN)	Source Name	Pollutant	Proposed Short- Term (lb/hr)			Long-Term Difference (tpy)	Unit Type (Used for reviewing BACT and Monitoring Requirements)
Not New/Modified	Yes	OP2SMLTK12	OP2SMLTK12	Neutralizing Amine Tank 971971	voc	2.15	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	OP2SMLTK05	OP2SMLTK05	Corrosion Inhibitor Tank 983323	H3PO4	2.15	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	46TK461014	OP2SMLTK06	AntiFoam Tote (OP2 Cooling Tower)	voc	2.15	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	ENMSSROUT	ENMSSROUT	MSS Vessel	VOC	4.37	0.05	0	0	MSS Activities
Not New/Modified	Yes	OP2ANALY	EOP2ANALY	Analyzers	VOC	0.03	0.13	0	0	Process Vent
Not New/Modified	Yes	49TK4916	49E09	Storáge Falik INO.	VOC	1.5	4.03	0	0	Process Vent
Not New/Modified	Yes				Benzene	0.77	2.39	0	0	
Not New/Modified	Yes	EFUGNH3	FUGNH3	OP2 NH3 Fugitives	NH3	0.05	0.24	0	0	Fugitives: Piping and Equipment Leak
Not New/Modified	Yes	44STMFUG	44STMFUG	Dilution Steam Vent	VOC	0.49	1.61	0	0	Process Vent
Not New/Modified	Yes				Acetone	0.01	0.02	0	0	
Not New/Modified	Yes	OP2SMLTK50	OP2SMLTK50	voc	voc	0.45	<0.01	0		Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia
Not New/Modified	Yes	OP2SMLTK33	OP2SMLTK33	Antifoulant Storage Tank	voc	0.27	0.01	0	0	Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia

# Texas Commission on Environmental Quality Form PI-1 General Application Stack Parameters

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

				Emission I	Point Discha	rge Paramete	ers					
		UTM Coordinates				Height	Stack Exit					Fugitives -
	Included in		East	North	Building	Above	Diameter	Velocity	Temperature	Fugitives -	Fugitives -	Axis
EPN	EMEW?	Zone	(Meters)	(Meters)	Height (ft)	Ground (ft)	(ft)	(FPS)	(°F)	Length (ft)	Width (ft)	Degrees
F44E00	No	15	295000	3301400						750	900	90
44FGWATER	No	15										
EOP2FUGEXP	No	15	295078	3301497	15					100	75	
44E08	No	15	295107	3301622		90	1.5	131	900			
EOP2DECOKE2	No	15	295110	3301604	90		1.5	131	900			
44E10	No	15	395051	3301415	NA	90	1.2	305.1	700			
44HTHTRS	No	15										
F4401 / F4402	No	15	295095	3301559								
F4403 / F4404	No	15	295095	3301581								
F4405 / F4406	No	15	295095	3301604								
F4407 / F4408	No	15	295095	3301626								
F4409 / F4410	No	15	295095	3301649								
F4411 / F4412	No	15	295095	3301672								
F4413 / F4414	No	15	295096	3301694								
F4418	No	15	295094	3301535								
F4415	No	15	295097	3301713								
F48001 A/B	No	15	294978	3301525								
EF4419	No	15	295079	3301518	194		8.5	45	340			
46E05	No	15	295110	3301539	NA	85	3.5	38.9	1700			
43E04	No	15	294843	3301383	NA	100	3.33	7.9	300			
43E06	No	15	294843	3301395	NA	97	3.33	15.1	720			
43E11	No	15	294843	3301377	NA	97	3.33	15.1	720			
43E07	No	15	294843	3301389	NA	82	3	1.4	300			
48E01	Yes											
43E05	No	15	294832	3301417	NA	48	0.5	225	1000			
45E02	No	15	294832	3301441	NA	48	0.5	225	1000			
45E07	No	15										
48E4602	Yes											
48E4603	No	15	294773	3301346								
48E4604	No	15	295085	3301381								
48E4605	No	15	295085	3301427								
48E4606	No	15	295085	3301450								
48E4607	No	15	295085	3301469								
OP2VJ48013	No	15	295085	3301358								
48E4301	No	15										
48E4303	No	15										
OP2PV48055	No	15	295085	3301404								
48E4501A	No	15										
48E11	No	15	295085	3301485								
44PVD4420	No	15										
48HTF4804A/B	No	15	294873	3301400								
OP2EN1	No	15	294873	3301438								
43E01	No	15	294896	3301519								
43E03	No	15	294969	3301492								

### Texas Commission on Environmental Quality Form PI-1 General Application Stack Parameters

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_ Company: \_Equistar\_\_\_

		UTM Coordinates				Height	Stack Exit					Fugitives -
	Included in		East	North	Building	Above	Diameter	Velocity	Temperature	Fugitives -	Fugitives -	Axis
EPN	EMEW?	Zone	(Meters)	(Meters)	Height (ft)	Ground (ft)	(ft)	(FPS)	(°F)	Length (ft)	Width (ft)	Degrees
45E11	No	15	294969	3301494								
46E07	No	15	294985	3301523								
48E07	No	15										
48E08	No	15										
48E22	No	15	294796	3301406								
48E20	No	15										
48E21	No	15										
49E01	No	15										
49E02	No	15	294722	3301507	NA	50				700	65	
49E03	No	15					3	35.33333	338			
49E01 to 49E03	No	15			213		10	30	425			
49E04	No	15				7.8	4.5	391.6	865			
49E05	No	15	294828	3301535	NA	15	3	0.0033	80			
49E06	No	15	294828	3301537	NA	15	3	0.0033	80			
49E07	No	15	295013	3301491	NA	10.5	3	<0.1	80			
40E04 to 49E07	No	15	294868	3301632	NA	7.3	3	<0.1	80			
49E08	No	15	294932	3301494	NA	10.5	3	<0.1	80			
49E10	No	15	294844	3301290	NA	15	3	<0.1	70			
49E11	No	15	295053	3301542	NA	24	3	<0.1	232			
49E12	No	15	295053	3301530	NA	24	3	0.0033	170			
49E13	No	15	295053	3301517	NA	30	3	0.0033	170			
OP2SMLTK08	No	15	294770	3301444	NA	48	3	0.0033	175			
48E009	No	15	294820	3301452	NA	48	3	0.0033	175			
48E010	No	15	294870	3301454	NA	48	3	0.0033	140			
44E13	No	15	294984	3301265	NA	40	3	<0.1	70			
44E12	No	15	294804	3301266	NA	40	3	0.003	170			
OP2SMLTK12	No	15	294864	3301266	NA	40	3	<0.1	70			
OP2SMLTK05												
OP2SMLTK06	No	15	295037	3301257	NA	48	3	<0.1	70			
ENMSSROUT	No	15	295079	3301257	NA	48	3	<0.1	70			
EOP2ANALY	No	15	294748	3301281	NA	48	3	<0.1	75			
49E09	No	15	294747	3301241	NA	48	3	<0.1	75			
FUGNH3												
44STMFUG	No	15	294592	3301134	NA	48	3	0.0033	180			
OP2SMLTK50	No	15	294644	3301175	NA	48	3	<0.1	70			
OP2SMLTK33	No	15	294644	3301132	NA	48	3	<0.1	70			

# Texas Commission on Environmental Quality Form PI-1 General Application Stack Parameters

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_ Company: \_Equistar\_\_\_

Included in		Building		Temperature (°F)	Fugitives - Length (ft)	Fugitives -	Fugitives - Axis Degrees

Date: _	_10/01/2019_
Permit #:	2933
Company:	_Equistar

No

A Application Time	I. Public Notice Applicability				
A. Application Type					
Is this an application for a new or major modif	ication of a PSD (including GHG), Nonattainment, or HAP permit?	Yes			
Is this an application for a minor permit amend		Yes			
Is there any change in character of emissions species)?	in this application (a new criteria pollutant or a new VOC or PM	No			
Is there a new air contaminant in this applicati	on?	No			
standardized emission factors, or reductions in emissions increase would be the sum of emissions amended permit for each air contaminant.  The table below will generate emission increa	s to permitted allowable emission rates when exclusively due to chan emissions which are not enforceable through the amended permit sions increases under the amended permit and the emissions decresses based on the values represented on the "Unit Types - Emission the "Unit Types - Emission Rates" worksheet to indicate if a unit's ps.	Thus, the total cases under the Rates" sheet.			
	y have been previously quantified and authorized as PM, PM10,and/ current guidance and policy to demonstrate compliance with current g the permit review.				
This row is optional. If you do not think the table below accurately represents public notice applicability increases for your project, provide discussion here (1000 characters).					

Version 4.0 Page 1

vegetable fibers (agricultural facilities)?

Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_ Company: \_Equistar\_\_\_

Pollutant	Current Long- Term (tpy)	Consolidated Emissions (tpy)	Proposed Long- Term (tpy)	Project Change in Allowable (tpy)	PN Threshold	Notice required?
VOC	740.46	0.00	742.62	2.16	5	No
PM	213.58	0.00	213.58	0.00	5	No
PM <sub>10</sub>	196.32	0.00	196.32	0.00	5	No
PM <sub>2.5</sub>	179.12	0.00	179.12	0.00	5	No
NO <sub>x</sub>	2090.67	0.00	2096.40	5.73	5	Yes
CO	2060.50	0.00	2089.99	29.49	50	No
SO <sub>2</sub>	147.55	0.00	150.36	2.81	10	No
Pb	0.00	0.00	0.00	0.00	0.6	No
NH3	12.02	0	12.02	0	5	No
Acetone	0.05	0	0.05	0	5	No
Benzene	23.08	0	23.08	0	5	No
H2S	0.05	0	0.05	0	5	No
H3PO4	0.01	0	0.01	0	5	No
* N1 (* · · ·		M0.5 '7				

<sup>\*</sup> Notice is required for PM, PM10, and PM2.5 if one of these pollutants is above the threshold.

<sup>\*\*</sup> Notice of a GHG action is determined by action type. Initial and major modification always require notice. Voluntary updates require a consolidated notice if there is a change to BACT. Project emission increases of CO2e (CO2 equivalent) are not relevant for determining public notice of GHG permit actions.

C. Is public notice required for this project as represented in this workbook?	Yes
If no, proceed to Section III Small Business Classification.	
Note: public notice applicability for this project may change throughout the technical review.	
D. Are any HAPs to be authorized/re-authorized with this project? The category "HAPs" must	No
be specifically listed in the public notice if the project authorizes (reauthorizes for renewals) any	
HAP pollutants.	

#### II. Public Notice Information

Complete this section if public notice is required (determined in the above section) or if you are not sure if public notice is required.

#### A. Contact Information

Enter the contact information for the **person responsible for publishing.** This is a designated representative who is responsible for ensuring public notice is properly published in the appropriate newspaper and signs are posted at the facility site. This person will be contacted directly when the TCEQ is ready to authorize public notice for the application.

-	
Prefix (Mr., Ms., Dr., etc.):	Mrs.
First Name:	Teresa
Last Name:	Peneguy
Title:	Environmental Permitting

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

Company Name:	LyondellBasell
Mailing Address:	PO Box 777
Address Line 2:	
City:	Channelview
State:	Texas
ZIP Code:	77530
Telephone Number:	281-452-8330
Fax Number:	
Email Address:	teresa.peneguy@lyb.com
Enter the contact information for the <b>Tech</b> notice as a contact for additional informat	<b>Innical Contact.</b> This is the designated representative who will be listed in the public ion.
Prefix (Mr., Ms., Dr., etc.):	Mrs.
First Name:	Teresa
Last Name:	Peneguy
Title:	Environmental Permitting
Company Name:	LyondellBasell
Mailing Address:	PO Box 777
Address Line 2:	
City:	Channelview
State:	Texas
ZIP Code:	77530
Telephone Number:	281-452-8330
Fax Number:	
Email Address:	teresa.peneguy@lyb.com

#### B. Public place

Place a copy of the full application (including all of this workbook and all attachments) at a public place in the county where the facilities are or will be located. You must state where in the county the application will be available for public review and comment. The location must be a public place and described in the notice. A public place is a location which is owned and operated by public funds (such as libraries, county courthouses, city halls) and cannot be a commercial enterprise. You are required to prearrange this availability with the public place indicated below. The application must remain available from the first day of publication through the designated comment period.

If this is an application for a PSD, nonattainment, or FCAA §112(g) permit, the public place must have internet access available for the public as required in 30 TAC § 39.411(f)(3).

If the application is submitted to the agency with information marked as Confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC 197, P.O. Box 13087, Austin, Texas 78711-3087.

Name of Public Place:	North Channel Branch Library	
Physical Address:	15741 Wallisville Road	
Address Line 2:		
City:	Houston	
ZIP Code:	77049	
County:	Harris	
Has the public place granted authorization to place the application for public viewing and copying?		Yes
Does the public place have Internet acces	ss available for the public?	Yes

Date: _	_10/01/2019_
Permit #:	2933
Company:	_Equistar

C.	<b>Alternate</b>	Language	Publ	lication

In some cases, public notice in an alternate language is required. If an elementary or middle school nearest to the facility is in a school district required by the Texas Education Code to have a bilingual program, a bilingual notice will be required. If there is no bilingual program required in the school nearest the facility, but children who would normally attend those schools are eligible to attend bilingual programs elsewhere in the school district, the bilingual notice will also be required. If it is determined that alternate language notice is required, you are responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

Is a bilingual program required by the Tex District?	Yes					
Are the children who attend either the eler closest to your facility eligible to be enrolle the district?	Yes					
If yes to either question above, list which I bilingual program?	language(s) are required by the	Spanish				
D. PSD and Nonattainment Permits Onl	-					
If this is an application for emissions of GI "Consolidated Public Notice". Note: Separ	•		Not applicable			
We must notify the applicable county judg is received. This information can be obtain		Nonattainment pe	rmit or modification application			
https://www.txdirectory.com						
Provide the information for the County Ju	idge for the location where the facility is	s or will be located	I.			
The Honorable:	Lina Hidalgo					
Mailing Address:	1001 Preston, Suite 911					
Address Line 2:						
City:	Houston					
State:	Texas					
ZIP Code:	77002					
Provide the information for the <b>Presiding</b>	Officer(s) of the municipality for this fa	acility site. This is f	frequently the Mayor.			
First Name:	Adrian					
Last Name:	Garcia					
Title:	43000 islanor					
Mailing Address:	Houston Dlaw S					
Address Line 2:						
City:	Pasadena					
State:	Texas					
ZIP Code:	77505					
Are the proposed facilities located within 100 km or less of an affected state or Class I Area?	No					

Date: \_10/01/2019\_ Permit #: \_\_2933\_\_\_ Company: \_Equistar\_\_\_

III. Small Business Classification	
Complete this section to determine small business classification. If a small business requests a permit, agency rul 39.603(f)(1)(A)) allow for alternative public notification requirements if all of the following criteria are met. If these met, public notice does not have to include publication of the prominent (12 square inch) newspaper notice.	, -
Does the company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?	No
Small business classification:	No

### Texas Commission on Environmental Quality Form PI-1 General Application Federal Applicability

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

I. County Classification			
i. County Classification			
Does the project require retrospective review?		No	
County (completed for you from your response on the	he General sheet)	Harris	
This project will be located in an area that is in attain	nment for ozone as of		
Sept. 23, 2019. Select from the drop-down list to the	e right if you would like		
the project to be reviewed under a different classific	cation. I	Ozone - Serious	
		ated in a county with a Serious	
			a Serious Ozone nonattainment elow and provide an analysis with
Determination:	the application.		
II.	PSD and GHG PSD App	olicability Summary	
Is netting required for the PSD analysis for this		,,	No
	-		
Pollutant	Project Increase	Threshold	PSD Review Required?
CO	29.49	100	No
NO <sub>x</sub>	5.73	40	No
РМ	0	25	No
PM <sub>10</sub>	0	15	No
PM <sub>2.5</sub>	0	10	No
SO <sub>2</sub>	2.81	40	No
Pb			
H <sub>2</sub> S			
TRS			
Reduced sulfur compounds (including H <sub>2</sub> S)			
H <sub>2</sub> SO <sub>4</sub>			
Fluoride (excluding HF)			
CO2e			
ı	II. Nonattainment Appl	icability Summary	
Is netting required for the nonattainment analys	is for this project?		Yes
If yes, the project increases listed below should be	after netting has been pe	rformed. Attach the netting inforr	nation to the application.
Pollutant	ollutant Project Increase (after netting) Threshold NA Review Required?		

# Texas Commission on Environmental Quality Form PI-1 General Application Federal Applicability

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_ Company: \_Equistar\_\_\_

Ozone (as VOC)	2.16	40	No
Ozone (as NO <sub>x</sub> )	5.73	5	Yes

IV. Offset Summary (for Nonattainment Permits)			
Pollutant	Offset Ratio	et Ratio Offset Quantity Required (tpy) Where is the offse	
Ozone (as NO <sub>x</sub> )	1.20 : 1	6.876	Purchase
	·		

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

I. General Information - Non-Renewal			
Is this project for new facilities controlled and operated directly by the federal government? (30 TAC § 116.141(b)(1) and 30 TAC § 116.163(a))		No	
A fee of \$75,000 shall be required if no estimate of capital project cost is included with the			
permit application. (30 TAC § 116.141(d)) Select "yes" here to use this option. Then skip sections II and III.		No	
Select Application Type	Major Application		

II. Direct Costs - Non-Renewal		
Type of Cost	Amount	
Process and control equipment not previously owned by the applicant and not currently authorized under this chapter.	\$0.00	
Auxiliary equipment, including exhaust hoods, ducting, fans, pumps, piping, conveyors, stacks, storage tanks, waste disposal facilities, and air pollution control equipment specifically needed to meet permit and regulation requirements.	\$0.00	
Freight charges.	\$0.00	
Site preparation, including demolition, construction of fences, outdoor lighting, road, and parking areas.	\$0.00	
Installation, including foundations, erection of supporting structures, enclosures or weather protection, insulation and painting, utilities and connections, process integration, and process control equipment.	\$0.00	
Auxiliary buildings, including materials storage, employee facilities, and changes to existing structures.	\$0.00	
Ambient air monitoring network.	\$0.00	
Sub-Total:	\$0.00	

III. Indirect Costs - Non-Renewal		
Type of Cost	Amount	
Final engineering design and supervision, and administrative overhead.	\$0.00	
Construction expense, including construction liaison, securing local building permits, insurance, temporary construction facilities, and construction clean-up.	\$0.00	
Contractor's fee and overhead.	\$0.00	
Sub-Total:	\$0.00	

#### IV. Calculations - Non-Renewal

For GHG permits: A single PSD fee (calculated on the capital cost of the project per 30 TAC § 116.163) will be required for all of the associated permitting actions for a GHG PSD project. Other NSR permit fees related to the project that have already been remitted to the TCEQ can be subtracted when determining the appropriate fee to submit with the GHG PSD application. Identify these other fees in the GHG PSD permit application.

Date: _	_10/01/2019_
Permit #:	2933
Company:	_Equistar

In signing the "General" sheet with this fee worksheet attached, I certify that the total estimated capital cost of the project as defined in 30 TAC §116.141 is equal to or less than the above figure. I further state that I have read and understand Texas Water Code § 7.179, which defines Criminal Offenses for certain violations, including intentionally or knowingly making, or causing to be made, false material statements or representations.

Estimated Capital Cost	Major Application Fee
Less than \$300,000	\$3,000 (minimum fee)
\$300,000 - \$7,500,000	1.0% of capital cost
\$300,000 - \$25,000,000	N/A
Greater than \$7,500,000	\$75,000 (maximum fee)
Greater than \$25,000,000	N/A

Your estimated capital cost:	\$0.00	Minimum fee applies.
Permit Application Fee:		\$3,000.00

VI. Total Fees	
Note: fees can be paid together with one payment or as two separate payments.	
Non-Renewal Fee	\$3,000.00
Total	\$3,000.00

VII. Payment Information				
A. Payment One (required)				
Was the fee paid online?		No		
Enter the fee amount:		\$	3,000.00	
Enter the check, money order, ePay Voucher, or other transaction number:	WRS0019807			
Enter the Company name as it appears on the check:	Equistar Chemicals LP			

Date: _	_10/01/2019_
Permit #:	2933
Company:	_Equistar

C. Total Paid	\$3,000.00

VIII. Professional Engineer Seal Requirement		
Is the estimated capital cost of the project above \$2 million?		
Is the application required to be submitted under the seal of a Texas licensed P.E.?	No	
Note: an electronic PE seal is acceptable.		

Date: \_10/01/2019\_ Permit #: \_\_2933\_\_\_ Company: \_Equistar\_\_\_

Pollutant	Does this pollutant require PSD review?	How will you demonstrate that this project meets all applicable requirements?	Notes	Additional Notes (optional)
Ozone	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
voc	No	MERA analysis, steps 0-2 only or using screening tables	Attach a detailed description of which MERA step was met for each species in the project. Include speciated emission rates with the total VOC and/or PM species corresponding to the short-term and long-term differences represented on the Unit Types-Emission Rates sheet.	
со	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
РМ	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
PM10	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
PM2.5	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
SO2	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
NOx	No	Modeling: screen or refined	Attach a completed "Electronic Modeling Evaluation Workbook" (EMEW).	
NH3	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
Acetone	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
Benzene	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
H2S	No	Not applicable	This pollutant is not a part of this project or does not require an impacts analysis.	
H3PO4				

Date:	_10/01/2019_
Permit #: _	2933
Company:	_Equistar

Plant Type				Current Tier I BACT	Confirm	Additional Notes
· idiit i ype						7 Maria Maria Maria
					<del> </del>	
Plant fuel gas facility				Maximum short term H2S emissions: 0.1 gr/dscf or 160 ppmv. Maximum annual H2S	Yes	
Action Requested	FINs	Unit Type	Pollutant	Current Tier I BACT	Confirm	Additional Notes
New/Modified	48FL4801P/F	Control: Flare	NOx	Provide emission factor used and reference.	Yes	Use TCEQ factor of 0.068 lb/MMBtu for low Btu, steam-assisted flare
			со	Provide emission factor used and reference.	Yes	Use TCEQ factor of 0.3503 lb/MMBtu for high Btu, steam-assisted flare
			SO2	Provide emission factor used and reference.	Yes	Natural gas has less than 5 grains/100 dscf
				VOC: Meets 40 CFR 60.18. Destruction Efficiency: 99% for certain compounds up to		
			VOC	three carbons, 98% otherwise. No flaring of halogenated compounds is allowed. Flow	Yes	Meets 98% control efficiency and 99% for compounds up to 3 carbons
				monitor required. Composition or BTU analyzer may be required.		
	_		1400	Comment of the Commen		No object to MOO
			MSS	Same as normal operation BACT requirements.		No changes to MSS

#### Monitoring

This sheet provides the minimum acceptable requirements to demonstrate compliance through monitoring for each pollutant proposed to be emitted from each FIN. This sheet also includes measuring techniques for sources of

#### Instructions:

1. The unit types listed under Unit Type (column B) include all new, modified, consolidated, and/or renewed sources as indicated on the "Unit Types - Emission Rates" sheet. Each new, modified, consolidated, and/or renewed ource must address how compliance will be demonstrated.

2. The pollutants listed in Pollutant (column C) include the pollutants indicated on the "Unit Types - Emission Rates" sheet.

#### Monitoring (30 TAC § 116.111(a)(2)(G))

- The minimum acceptable monitoring is automatically populated for each unit type and pollutant.
   Additional monitoring may be required, particularly for Title V sources, and will be included in the NSR and/or Title V permits.
- . Fully expand the Minimum Monitoring Requirements (column D) by increasing the row heights so all text is visible. (Place the cursor on the bottom of the number line to the far left of the screen, click and drag downward until all text is visible.)
- . Review the monitoring and confirm that you will meet all representations listed on the sheet and any additional attachments by entering or selecting "Yes" in Confirm (column E). 5. Add additional notes as necessary in Additional Notes for Monitoring (column F), limited to 500 characters or fewer. Examples include the following:
- Proposed monitoring for pollutants or units that list "See additional notes:";
- Details requested in the populated data; Alternative monitoring you are proposing; and
- Any additional information relevant to the minimization of emissions.
- . Cap EPNs do not need monitoring (leave those rows blank).

#### Measurement of Emissions (30 TAC § 116.111(a)(2)(B))

Note: this section will be greyed out if this project does not require PSD or nonattainment review, as represented on the General sheet.

- 7. For each pollutant with a project increase **greater** than the PSD significant emission rate, select the proposed measurement technique using the dropdown (column G).
  8. For each pollutant with a project increase **less** than the PSD significant emission rate; leave blank.
  9. If selecting 'other', provide clatals in Additional Notes for Measuring (column) and the second project increase the project incre

- 10. You may also use the Additional Notes for Measuring (column H) to provide more details on a selection.

Important Note: The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours. All required records must be maintained in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application. The site must make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner. The applicant must comply with a validational recordkeeping requirements specified in special conditions in the permit. All records must be retained in the file for at least two years following the date that the information or data is obtained. Some permits are required to maintain records for five years. [30 TAC § 116.115(b)(2)(E)]

FIN	Unit Type	Pollutant	Minimum Monitoring Requirements	Confirm	Additional Notes for Monitoring	Proposed Measurement Technique (only complete for pollutants with a project increase above the PSD threshold)	Additional Notes for Measuring:
48FL4801P/F	Control: Flare		Pilot flame presence monitored continuously. Waste gas flow and	Yes	Monitor vent flow and analyze vent stream		
			Pilot flame presence monitored continuously. Waste gas flow and	Yes	Monitor vent flow and analyze vent stream		
			Pilot flame presence monitored continuously. Waste gas flow and	Yes	Monitor vent flow and analyze vent stream		
		VOC	Pilot flame presence monitored continuously. Waste gas flow and	Yes	Monitor vent flow and analyze vent stream		

Date: \_10/01/2019\_ Permit #: \_\_\_2933\_\_\_ Company: \_Equistar\_\_\_

Item	How submitted	Date submitted
A. Administrative Information	·	•
Form PI-1 General Application	Email	11/19/2019
Hard copy of the General sheet with original (ink) signature	Mail	11/19/2019
Professional Engineer Seal	Not applicable	
B. General Information		•
Copy of current permit (both Special Conditions and MAERT)		
Core Data Form		
Area map	Mail	11/19/2019
Plot plan	Mail	11/19/2019
Process description	Mail	11/19/2019
Process flow diagram	Mail	11/19/2019
List of MSS activities		
State regulatory requirements discussion	Mail	11/19/2019
C. Federal Applicability		
Summary and project emission increase determination - Tables 1F and 2F	Mail	11/19/2019
Netting analysis (if required) - Tables 3F and 4F as needed	Not applicable	
D. Technical Information		
BACT discussion, if additional details are attached	Email	11/19/2019
Monitoring information, if additional details are attached	Email	11/19/2019
Material Balance (if applicable)	Not applicable	
Calculations	Email	11/19/2019
E. Impacts Analysis		
Qualitative impacts analysis		
MERA analysis	Email	11/19/2019
Electronic Modeling Evaluation Workbook: SCREEN3	Email	11/19/2019
Electronic Modeling Evaluation Workbook: NonSCREEN3	Not applicable	
PSD modeling protocol		
F. Additional Attachments		
Expedited Permit Feed	Mail	11/19/2019

#### **Texas Commission on Environmental Quality**

### Electronic Modeling Evaluation Workbook for SCREEN3 General

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: Equistar

EMEW Version No.: Version 2.2

#### Purpose Statement:

This workbook is completed by the applicant and submitted to the Texas Commission on Environmental Quality (TCEQ), specifically, the Air Dispersion Modeling Team (ADMT) for review. This workbook is a tool available for all projects using SCREEN3 for an impacts review and its use is required starting June 1, 2019. Provide the workbook with the permit application submittal for any Minor New Source Review project requiring a modeling impacts demonstration.

This workbook follows the guidance outlined in the Air Quality Modeling Guidelines (APDG 6232, September 2018) which can be found here:

https://www.tceg.texas.gov/assets/public/permitting/air/Modeling/guidance/airquality-mod-quidelines6232.pdf

#### Workbook Instructions:

- 1. Save a copy of the workbook to your computer or desktop prior to entering data.
- Complete all required sections leaving no blanks. You may use the "tab" button or the arrow keys to move to the next available cell. Use "enter" to move down a line. Note: drop-downs are case-sensitive.
- 3. Fill in the workbook in order, do not skip around as this will cause errors. Use caution if changing a previously entered entry.
- 4. Not applicable sections of this workbook will be hidden as data is entered. For example, answering "No" to "Is downwash applicable?" will hide these sections of the workbook required only for downwash entry.
- 5. Email the workbook electronic file (EMEW) and any attachments to the Air Permits Initial Review Team. The subject line should read "Company Name Permit Number (if known) NSR Permit Application". Email address:

#### apirt@tceq.texas.gov

- 6. If printing the EMEW, follow the directions below to create a workbook header.
- 7. Printing the EMEW is not required for submitting to the Air Permits Division (APD); however, you may need to print it for sending to the regional offices, local programs, and for public access if notice is required. To print the workbook, follow the instructions below. Please be aware, several sheets contain large amounts of data and caution should be taken if printing, such as the Speciated Emissions sheet.
- 8. Updates may be necessary throughout the review process. Updated workbooks must be submitted in electronic format to APD. For submittal to regional offices, local programs, or public places you only have to print sheets that had updates. Be sure to change the headers accordingly.

Note: Since this will be part of the permit application, follow the instructions in the Form PI-1 General Application on where to send copies of your EMEW and permit application. The NSR Application Workbook can be found https://www.tceg.texas.gov/permitting/air/quidance/newsourcereview/nsrapp-tools.html

#### Create Headers Before Printing:

- 1. Right-click one of the workbook's sheet tabs and "Select All Sheets."
- 2. Enter the "Page Layout View" by using the navigation ribbon's View > Workbook Views > Page Layout, or by clicking the page layout icon in the lower-right corner of Excel.
- Add the date, company name, and permit number (if known) to the upper-right header. Note that this may take up to a minute to update your spreadsheet. Select any tab to continue working on the spreadsheet.

#### Printing Tips:

While APD does not need a hard copy of the full workbook, you may need to print it for sending to the regional offices, local programs, and for public access if notice is required.

- 1. The default printing setup for each sheet in the workbook is set for the TCEQ preferred format. The print areas are set up to not include the instructions on each sheet.
- You have access to change all printing settings to fit your needs and printed font size. Some common options include:
  - -Change what area you are printing (whole active sheet or a selection);
- -Change the orientation (portrait or landscape);
- -Change the margin size; and
- -Change the scaling (all columns on one sheet, full size, your own custom selection, etc.).

#### **Texas Commission on Environmental Quality**

### Electronic Modeling Evaluation Workbook for SCREEN3 General

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

	Select from the drop down:	
Evaluation Workbook and any requested data, I have not cha	tting an authorized TCEQ Electronic Modeling necessary attachments. Except for inputting the nged the TCEQ Electronic Modeling Evaluation ng but not limited to changing formulas, formatting,	Choose an item
	Administrative Information:	
Data Type:	Facility Information:	
Project Number (6 Digits):		
Permit Number:	2933	
Regulated Entity ID (9 Digits):	100542281	
Facility Name:	Equistar Channelview	
Facility Address:	8280 Sheldon Road	
Facility County (select one):	Harris	
Company Name:	Equistar Chemicals, LP	
Company Contact Name:	Teresa Peneguy	
Company Contact Number:	281-452-8330	
Company Contact Email:	teresa.peneguy@lyb.com	
Modeling Contact Name:	Teresa Peneguy	
Modeling Company Name, as applicable:	LyondellBasell	
Modeling Contact Number:	281-452-8330	

Sheet Instructions: Indicate in the Table of Contents which sections are applicable and included for this modeling demonstration. Select "X" from the drop down if the item below is included in the workbook. Note: This workbook is only for SCREEN3 analyses. Please use the separate Electronic Modeling Evaluation Workbook (EMEW) for the following air dispersion models: AERSCREEN, ISC/ISCPrime, and/or AERMOD.

teresa.peneguy@lyb.com

Existing Site

10/9/2019

Modeling Contact Email:

New/Existing Site (select one):

Modeling Date (MM/DD/YYYY):

	Table of Contents		
Section: Sheet Title (Click to jump to specific sheet):		Select an X from the dropdown menu if included:	
1	General		
2	Model Options	X	
3	Building Downwash		
4	Flare Source Parameters	X	
5	Point Source Parameters		
6	Area Source Parameters		
7	Volume Source Calculations		
8	Volume Source Parameters		
9	Point and Flare Source Emissions	X	
10	Area Source Emissions		
11	Volume Source Emissions		
12	Speciated Emissions	X	
13	Intermittent Sources		
14	Modeling Scenarios	X	
15	Monitor Calculations		
16	Background Justification		
17	Secondary PM2.5 Analysis (MERPs calculations)		
18	NAAQS/State Property Line (SPL) Modeling Results	X	
19	Unit Impact Multipliers	X	
20	Health Effects Modeling Results	X	
21	Modeling File Names	X	
22	Speciated Chemicals	X	

#### **Texas Commission on Environmental Quality**

Electronic Modeling Evaluation Workbook for SCREEN3

General

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

Included Attachments Instructions: The following are attachments that must be included with any modeling analysis. If providing the plot plan and area map with the permit application, ensure there is also a copy with the EMEW. The copy can be electronic.	Select an X from the dropdown menu if included:
Plot Plan:	
Instructions: Mark all that apply in the attached plot plan. For larger properties or dense sor multiple zoomed in plot plans that are legible.	urce areas, provide
Property/Fence Lines all visible and marked.	X
North arrow included.	X
Clearly marked scale.	X
All sources and buildings are clearly labeled.	X
Area Map:	
Instructions: Mark all that apply in the attached area map.	
Annotate schools within 3,000ft of source's nearest property line.	X
All property lines are included.	X
Non-industrial receptors are identified.	X
Additional Attachments (as applicable): Note: These are just a few examples of attachments that may need to be included. There may be others depending on the scope of the modeling analysis.	Select an X from the dropdown menu if included:
Single Property Line Designation	
Include Agreement, Order, and map defining each petitioner.	Х
Post Processing using Unit Impact Multipliers (UIMs)	
Include documentation on any calculations used with the UIMs (i.e., Step 3 of the MERA).	
Modeling Techniques	
Provide documentation on modeling techniques indicated in the workbook.	
Other Attachments Provide a list in the box below of additional attachments being provided that are not listed at	bove:
	Choose an item

Electronic Modeling Evaluation Workbook for SCREEN3

Model Options

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

i. Troject illiorination
A. Project Overview: In the box below, give a brief Project Overview. To type or insert text in box, double click in the box below. Please limit your response to 2000 characters.
Natural gas is being added to flare to meet furture regulatory flame zone heat value
requirements for flares.
requirements for hares.

### II. Air Dispersion Modeling Preliminary Information

I Project Information

Instructions: Fill in the information below based on your modeling setup. The selections chosen in this sheet will carry throughout the sheet and workbook. Based on selections below, only portions of the sheet and workbook will be available. Therefore, it is vital the sheet and workbook are filled out in order, do NOT skip around.

For larger text boxes, double click to type or insert text.

A. Building Downwash							
No Is downwash applicable? (Select "Yes" or "No")							
B. Type of	B. Type of Analyses: (Select "X" in all that apply)						
X	Minor NSR NAAQS	X	State Property Line				
X	Health Effects		•				

# Electronic Modeling Evaluation Workbook for SCREEN3 Model Options

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

C. Constituents Evaluating: (Select "X" in all that apply)						
NAAQS: List all pollutants that require an modeling review. (Select "X" in all that apply)						
Х	SO <sub>2</sub>		PM <sub>10</sub>			
Х	со		PM <sub>2.5</sub>			
	Pb	X	NO <sub>2</sub>			
Both			Identify which averaging periods are being evaluated for NO <sub>2</sub> .			
Tier 2: 0.9			Identify the 1-hr NO <sub>2</sub> tier used for SCREEN3.			
Tier 2: 0.9			Identify the annual NO <sub>2</sub> tier used for SCREEN3.			
State Prope apply)	erty Line: List all pollutants	that require	an modeling review. (Select "X" in all that			
	H <sub>2</sub> S	Х	SO <sub>2</sub>			
	H <sub>2</sub> SO <sub>4</sub>		•			
Health Effe numbers, ar		missions she	eet with all applicable pollutants, CAS			
	on Options: Select "X" in the sure to explain the reasoning		ect an option. Note: if selecting both the box below.			
X	Urban					
	Rural					
,	<u>'</u>	<u> </u>	ed above in the following box:			
Located in r	nunicipality of Channelview	lexas				

# Electronic Modeling Evaluation Workbook for SCREEN3 Model Options

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

E. Meteorological Data:	
Select Meteorological Dataset Modeled:	Full Meteorological Data
F. Receptor Grid:	
Describe the receptor grid being modeled in the fol	lowing text box:
10 m - 25000 m array; at ground level	
G. Terrain:	
Select the terrain option being modeled:	Flat
For justification on terrain selection, fill in the box b	elow:
Land is costal and flat	
M. Modeling Techniques: Briefly describe any mod analyses. Provide additional attachments, if needed	
Modeled emissions equivalent to 1 lb/hr increase; ε not be impacted by downwash structures.	emissions from flares sufficient height to

Electronic Modeling Evaluation Workbook for SCREEN3
Flare Source Parameters

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

		Modeling	Easting:	Northing:	Height	Heat Release	
EPN	Model ID	Scenario	X [m]	Y [m]	[m]	(cal/s)	Description
48E01	48E01	Routine	295309.68	3301313.00	167.64	8112194.00	OP2 Flare

Electronic Modeling Evaluation Workbook for SCREEN3

Point + Flare Emissions

Date: \_10/9/2019 Permit #: \_\_2933

Company Name: \_\_Equistar

EPN	Model ID	Modeling Scenario	Pollutant	Averaging Time	Standard Type	Review Context	Intermittent Source?	Modeled Emission Rate [lb/hr]	Basis of Emission Rate	Scalars or Factors Used?	Scalar/Factor in Use
48E01	48E01	Routine	Generic	1-hr			No	1.00	Generic Modeling at 1lb/hr	No	

Electronic Modeling Evaluation Workbook for SCREEN3

Point + Flare Emissions

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

		Downwash	Distance to
		Structure	Ambient Air
EPN	Model ID	Considered	(m)
48E01	48E01		203.00

Electronic Modeling Evaluation Workbook for SCREEN3
Speciated Emissions

Date: _10	/9/2019
Permit #:	2933
Company Name:E	Equistar

S	peciated Emissions by Model ID								
				Short-Term ESL	Long-Term ESL				
	CAS#	Chemical Species	Other Species	(μg/m³)	(μg/m³)				
	74-98-6	propane		Simple Asphyxiant	Simple Asphyxiant				

Electronic Modeling Evaluation Workbook for SCREEN3

Combined Emissions

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

		Modeling		Modeled Averaging				Source	Modeled Emission	Downwash Structure
EPN	Model ID	scenario	Pollutant	time	Standard Type	Review Context	Intermittent	Туре	Rate [lb/hr]	Considered
48E01	48E01	Routine	Generic	1-hr	NAAQS	SIL Analysis	No	Flare	1.00	

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

### Table 1. Project-Related Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	0.63000	14.3
H <sub>2</sub> SO <sub>4</sub>	1-hr		1
H <sub>2</sub> SO <sub>4</sub>	24-hr		0.3
H <sub>2</sub> S	1-hr		2.16 (If property is residential, recreational, business, or commercial)
H <sub>2</sub> S	1-hr		3.24 (If property is not residential, recreational, business, or commercial)

### Table 2. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m³)	Standard (µg/m³)
SO <sub>2</sub>	1-hr	3.44000	715
H <sub>2</sub> SO <sub>4</sub>	1-hr		50
H <sub>2</sub> SO <sub>4</sub>	24-hr		15
H <sub>2</sub> S	1-hr		108 (If property is residential, recreational, business, or commercial)
H₂S	1-hr		162 (If property is not residential, recreational, business, or commercial)

**Electronic Modeling Evaluation Workbook for SCREEN3 NAAQS-SPL Modeling Results** 

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

Table 3. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (μg/m³)
SO <sub>2</sub>	1-hr	3.44000	7.8*
SO <sub>2</sub>	3-hr	3.10000	25
SO <sub>2</sub>	24-hr	1.38000	5
SO <sub>2</sub>	Annual	0.28000	1
PM <sub>10</sub>	24-hr		5
NO <sub>2</sub>	1-hr	2.78000	7.5**
NO <sub>2</sub>	Annual	0.22000	1
CO	1-hr	15.91000	2000
CO	8-hr	11.13000	500

Additional information for the De Minimis values listed above can be found at:

www.tceq.texas.gov/assets/public/permitting/air/memos/appwso2.pdf

\* www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

### Table 4. $PM_{2.5}$ Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m³)	Secondary PM <sub>2.5</sub> Contribution (μg/m³)	Total Conc. = Secondary PM <sub>2.5</sub> + GLCmax (μg/m³)	De Minimis (μg/m³)						
PM <sub>2.5</sub>	24-hr		0	0.00000	1.2*						
PM <sub>2.5</sub>	Annual		0	0.00000	0.2*						
Additional information f	Additional information for the De Minimis values listed above can be found at:										
* www.tceg.texas.gov/	permitting/air/modeling/	epa-mod-guidance.html									

Table 5. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (μg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)
SO <sub>2</sub>	1-hr		0	0	196
SO <sub>2</sub>	3-hr		0	0	1300
SO <sub>2</sub>	24-hr		0	0	365
SO <sub>2</sub>	Annual		0	0	80
PM <sub>10</sub>	24-hr		0	0	150
Pb	3-mo		0	0	0.15
NO <sub>2</sub>	1-hr		0	0	188
NO <sub>2</sub>	Annual		0	0	100
CO	1-hr		0	0	40000
CO	8-hr		0	0	10000

Electronic Modeling Evaluation Workbook for SCREEN3
NAAQS-SPL Modeling Results

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

Table 6. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (μg/m³)	Secondary PM <sub>2.5</sub> Contribution (µg/m³)	Background (μg/m³)	Total Conc. = [Background + Secondary + GLCmax] (µg/m³)	Standard (µg/m³)
PM <sub>2.5</sub>	24-hr		0	0	0	35
PM <sub>2.5</sub>	Annual		0	0	0	12

Electronic Modeling Evaluation Workbook for SCREEN3
Unit Impact Multipliers

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

2 496	0.4992

EPN11	11A	Norm	6.24	5.616	4.368	2.496	0.4992
PORTVCU	PORTVCU	Generic	0.032	0.0288	0.0224	0.0128	0.00256

EPN	Model ID	Modeling Scenario	1-hr GLCmax (μg/m³ per lb/hr)	3-hr GLCmax (µg/m³ per lb/hr)	8-hr GLCmax (µg/m³ per lb/hr)	24-hr GLCmax (µg/m³ per lb/hr)	Annual GLCmax (µg/m³ per lb/hr)
48E01	48E01	Routine	1.86E-01	0.16695	0.12985	0.0742	0.01484

Electronic Modeling Evaluation Workbook for SCREEN3
Health Effect Modeling Results

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

Modele	d Health Effect Results	(MERA Guidance	):	Step 3
Chemical Species	CAS Number	Averaging Time	ESL [µg/m³]	10% ESL Step 3 Modeled GLCmax [µg/m³]
propane	74-98-6	1-hr	Simple Asphyxiant	

# Electronic Modeling Evaluation Workbook for SCREEN3 Modeling File Names

Date: \_10/9/2019 Permit #: \_\_2933 Company Name: \_\_Equistar

Administrative Information:					
Data Type:	Facility Information:				
Project Number:					
Permit Number:	2933				
Regulated Entity ID:	100542281				
Facility Name:	Equistar Channelview				
Company Name:	Equistar Chemicals, LP				
Company Contact Name:	Teresa Peneguy				
Company Contact Number:	281-452-8330				
County:	Harris				

This sheet documents the modeling file names included in the modeling analysis.

#### Instructions

- 1. Enter the file names of all submitted files for this modeling analysis.
- 2. Document the pollutants and/or averaging times included in the file.
- 3. Enter the file extensions associated with each file name. For example, one model run may create an input and output.
- 4. Give a brief description of what the file represents. For example, the type of analysis (project analysis, de minims analysis, site-wide analysis, full NAAQS analysis), or the type of receptor grid (industrial, non-industrial, industrial water, non-industrial water).

#### Notes:

1. Be sure to provide all files relied on in the modeling analyses.

### Example:

Model File Base Name	Pollutant	Averaging Time	File Extensions	Additional File Description
EPN_FUG_1hr_CO	CO	1-hr	*.out	de minimis
EPN_FUG_1hr_NO2	NO2	1-hr	*.out	de minimis
EPN_FUG_1hr_SO2	SO2	1-hr	*.out	de minimis
EPN_FUG_generic	generic	1-hr	*.out	project wide
EPN_POND_generic	generic	1-hr	*.out	project wide
EPN_POND_generic	generic	1-hr	*.out	project wide

Model File Base Name	Pollutant	Averaging Time	File Extensions	Additional File Description
OP2 HV	generic	1-hr	.s3i	flare

EPN

Model ID GLCmax @ 1 lb/hr ug/m3

48E01 48E01

0.1855 max occurs beyond property line

**Emissions Increase** 

multiplier 0.08

EPN		48E01	GLCmax	ESL	< 10%	48E01	GLCmax	.Cmax annı	ESL	< 10%
		Project			Project			FCI		
		Increase			ESL	Increase				ESL
		lb/hr	ug/m3	ug/m3		tpy	ug/m3	ug/m3	ug/m3	
NOx		16.65	3.089			5.73	0.243	0.0194		
СО		85.75	15.907			29.49	1.249	0.0999		
SO2		18.55	3.441			2.81	0.119	0.0095		
propane	74-98-6	1.32	0.245	Simple Asp	hyxiant	2.16	0.091	0.0073	Simple Asp	hyxiant

	1-hr		3-hr {		8-	hr	24-hr		Annual	
	multiplier	ug/m3								
NO2	0.9	2.78							0.08	0.22
СО	1	15.91			0.7	11.13				
SO2	1	3.44	0.9	3.10			0.4	1.38	0.08	0.28



Company:	Equistar Chemicals, LP & Lyondell Chemical Company	
Permit Application Number:	Various	Criteria Pollutant: NO <sub>X</sub>

A B C										
Pr	oject Date <sup>2</sup>	-	nich Emission	Permit No.	Project Name or Activity	Baseline	Baseline	Proposed	Difference	Creditable
		Change (	Occured <sup>3</sup>			Period	Emissions <sup>4</sup>	Emissions <sup>4</sup>	(A-B) <sup>5</sup>	Increase or Decrease <sup>6</sup>
		FIN	EPN				(tons/year)	(tons/year)		Decrease
1	Jan-2015	F-1203	EF1203	2128	KLP Project - Regeneration Heater	N/A- New Emission	-	0.24	0.24	0.24
2	Jan-2015	F-1202	EF1202	2128	KLP Project - Thermal Oxidizer	N/A- New Emission	-	2.19	2.19	2.19
3	Jan-2015	17FI1701	17E01	2128	KLP Project - East Plant Flare	2001-2002	19.73	24.40	4.67	4.67
4	Mar-2015	FL-6104	EFL6104	20416	Polyols 60KT Expansion	2004-2005	-	0.04	0.04	0.04
5	Mar-2015	ENGUT1	ENGUT1	79542	Engine Replacement	2013-2014	0.07	1.89	1.82	1.82
6	Mar-2015	EUTEN1	EUTEN1	132729	Engine Replacement	2013-2014	0.02	1.89	1.87	1.87
7	Mar-2015	OP2EN1	OP2EN1	98647	Engine Replacement	2013-2014	1.69	4.25	2.56	2.56
8	Mar-2015	OP1EN1	OP1EN1	112230	Engine Replacement	2013-2014	3.06	4.25	1.19	1.19
Page Subtotal <sup>7</sup>										14.58
Project Emission										
	Summary of	Contemporane	ous Changes						Total	105.43



Company:	Equistar Chemicals, LP & Lyondell Chemical Company	
Permit Application Number:	Various	Criteria Pollutant: NO <sub>X</sub>

A B C										
Pr	oject Date <sup>2</sup>	-	nich Emission Occured <sup>3</sup>	Permit No.	Project Name or Activity	Baseline Period	Baseline Emissions <sup>4</sup> (tons/year)	Proposed Emissions <sup>4</sup> (tons/year)	Difference (A-B) <sup>5</sup>	Creditable Increase or Decrease <sup>6</sup>
		FIN	EPN				()	(,		
9	May-2015	FL68493	EFL68493	Standard Permit 131137	FLARE TIP REPLACEMENT	2005-2006	1.69	0.11	-1.58	-
10	May-2015	FL68491	FL68491	133250	FLARE TIP REPLACEMENT	2013-2014	0.03	0.04	0.01	0.01
11	Dec-2015	48E01	48E01	PBR 136396	Alky Propane Project	N/A- New Emission	-	0.01	0.01	0.01
12	Oct-2016	ZMSENAIS	ZMSENAIS	101590	Update Emission Factor	2010-2011	1.79	2.87	1.08	1.08
13	Mar-2017	17FL1701, 17FL1701F, 17FL1701P	17E01	143753	Alky vent to East Plant Flare	2014-2015	2.50	7.37	4.87	4.87
14	Jun-2017	OP2EN1	OP2EN1	147365	Engine Replacement	N/A- New Emission	-	3.88	3.88	3.88
15	Jan-2018	38FL3801F	38E01	150258	Analyzer to Flare project	N/A- New Emission	-	0.01	0.01	0.01
16	Jan-2018	48FL4801F	48E01	150257	Analyzer to Flare project	N/A- New Emission	-	0.01	0.01	0.01
Page Subtotal <sup>7</sup>									9.87	
Project Emission										
,	Summary of	Contemporane	ous Changes						Total	105.43



Company:	Equistar Chemicals, LP & Lyondell Chemical Company	
Permit Application Number:	Various	Criteria Pollutant: NO <sub>X</sub>

							А	В	С	
Pr	oject Date <sup>2</sup>	Facility at Wh Change ( FIN	_	Permit No.	Project Name or Activity	Baseline Period	Baseline Emissions <sup>4</sup> (tons/year)	Proposed Emissions <sup>4</sup> (tons/year)	Difference (A-B) <sup>5</sup>	Creditable Increase of Decrease
17	Jan-2018	17FL1701F	17E01	150031	Analyzer to Flare project	N/A- New Emission	-	0.02	0.02	0.02
18	Mar-2019	25FL2502F, 25FL2502P	25E02	22779	PolyBD Renewal & Amendment	2011-2012	4.50	6.37	1.87	1.87
19	May-2018	EFL6104	FL6104	151560	GBL/NMP Production Increase	N/A- New Emission	-	0.00	0.00	0.00
20	Aug-2018	48EFL4801F	48E01	152624	Flex Coalescors	N/A- New Emission	-	0.01	0.01	0.01
21	Nov-2018	25FL25E01	25E01	153580	IPOH change in Crude Acetone Feed Conc	Actual	-	0.07	0.07	0.07
22	Dec-2018	48FL4801F	48E01	153835	Flex C3 Membrane	Increase N/A - Project Actual Increase	-	0.00	0.00	0.00
23	Jan-2019	48FL4801F	48E01	154482	Y-grage feed	Increase N/A - Project Actual Increase	-	0.00	0.00	0.00
24	Mar-2019	EUTEN1	EUTEN1	155453	Air Compressor	N/A- New Emission	-	0.41	0.41	0.41
								Page	e Subtotal <sup>7</sup>	2.40
								Projec	ct Emission	
Summary of Contemporaneous Changes Total										105.43



Company:	Equistar Chemicals, LP & Lyondell Chemical Company	
Permit Application Number:	Various	Criteria Pollutant: NO <sub>X</sub>

A B C											
Pr	oject Date <sup>2</sup>	Facility at Wh	nich Emission	Permit No.	Project Name or Activity	Baseline	Baseline	Proposed	Difference	Creditable	
		Change (	Occured <sup>3</sup>			Period	Emissions <sup>4</sup>	Emissions <sup>4</sup>	(A-B) <sup>5</sup>	Increase or	
							(tons/year)	(tons/year)	, ,	Decrease <sup>6</sup>	
		FIN	EPN				,	,			
25	Jan-2019	MEOHFLARE/ MEOHFLR2	EMEOHFLAR E/EMEOHFLR 2	154481	Flare operated unassisted	11/2016- 10/2018	1.8	7.97	6.18	6.18	
26	Jan-2019	FL6104	EFL6104	154220	Polyols Production Increase	N/A - Project Actual Increase	-	0.00	0.00	0.00	
27	Jan-2019	FL68491	EFL68491	154483	POSMII O2	N/A - Project Actual Increase	-	0.00	0.00	0.00	
28	May-2020	37E03	37E03	156142	F-3701 Burner Mod	2011-2012	1.6	10.74	9.17	9.17	
29	Sep-2019	EMEOHFLAR E	EMEOHFLAR E	8125	Renewal/Amend	N/A- New Emission	-	6.70	6.70	6.70	
30	Mar-2019	PPTO	PPTO	156509	HTC	N/A- New Emission	1	0.12	0.12	0.12	
31	May-2019	EUTENAIR1	EUTENAIR1	157139	Air Compressor & OP1 Engine	N/A- New Emission	ı	1.73	1.73	1.73	
32	May-2019	OP1EN1	OP1EN1	157139	Air Compressor & OP1 Engine	N/A- New Emission	-	3.88	3.88	3.88	
Page Subtotal <sup>7</sup>										27.79	
Project Emission											
,	Summary of	Contemporane	ous Changes						Total	105.4	



Company:	Equistar Chemicals, LP & Lyondell Chemical Company	
Permit Application Number:	Various	Criteria Pollutant: NO <sub>X</sub>

	_						А	В	С	
Pr	oject Date <sup>2</sup>	•	nich Emission Occured <sup>3</sup> EPN	Permit No.	Project Name or Activity	Baseline Period	Baseline Emissions <sup>4</sup> (tons/year)	Proposed Emissions <sup>4</sup> (tons/year)	Difference (A-B) <sup>5</sup>	Creditable Increase or Decrease <sup>6</sup>
33	Jun-2019	17FL1701	17E01	157394	Move IPOH flare to East Plant	2014/2015	-	0.72	0.72	0.72
34	Jul-2019	17FL1701	17E01	157735	Alky Production Increase	N/A- New Emission	-	0.00	0.00	0.00
35	Nov-2019	OP2EN1	OP2EN1	159310	New OP2EN1	N/A- New Emission	-	3.88	3.88	3.88
36	Nov-2019	38E01	38E01	1768	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	19.37	19.37	19.37
37	Nov-2019	17E01	17E01	2128	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	9.11	9.11	9.11
38	Nov-2019	48E01	48E01	2933	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	5.73	5.73	5.73
39	Nov-2019	FL60731	EFL60731	4121	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	6.06	6.06	6.06
40	Nov-2019	EFL6105	EFL6105	18103	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	3.25	3.25	3.25



Con	ipany:		Equistar Cher	nicals, LP & Lyc	ondell Chemical Company		_	_			
Perr	nit Application I	Number:	Various	·		Criteria Poll	utant: NO <sub>x</sub>				
							А	В	С		
Pi	oject Date <sup>2</sup>	_	nich Emission Occured <sup>3</sup> EPN	Permit No.	Project Name or Activity	Baseline Period	Baseline Emissions <sup>4</sup> (tons/year)	Proposed Emissions <sup>4</sup> (tons/year)	Difference (A-B) <sup>5</sup>	Creditable Increase or Decrease <sup>6</sup>	
								Page	e Subtotal <sup>7</sup>	48.1	
Project Emission											
	Summary of	Contemporane	eous Changes						Total	105.4	
41	Nov-2019	EFL6103	EFL6103	19155	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	1.81	1.81	1.81	
42	Nov-2019	EFL6104	EFL6104	19155	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	0.76	0.76	0.76	
43	Dec-2019	EFL68491	EFL68491	19613	Flare Nat Gas for 270 Flare HV compliance	N/A- New Emission	-	0.10	0.10	0.10	
44	-	-	-	-	-	-	-	-	-	-	
45	-	-	-	-	-	-	-	-	-	-	
46	-	-	-	-	-		-	-	-	-	
47	-	-	-	-	-		-	-	-	-	
48	-	-	-	-	-		-	-	-	-	
		-				•			e Subtotal <sup>7</sup>	2.7	
	Summary of	Contemporane	ous Changes					Projec	ct Emission <b>Total</b>	105.4	

## COMPREHENSIVE REPORT

Report Date: 12/30/2019

**Facility Information** 

Name:

**Facility Name:** 

Corporate/Company EQUISTAR CHEMICALS, LP

KIM FOLEY 281-862-5150

**RBLC ID:** TX-0864 (draft) Date

**Determination** 

**Last Updated:** 10/03/2019

**Permit** N266,

PSDTX1542, Number:

GHGPSDTX183

2869

09/09/2019 EQUISTAR CHEMICALS CHANNELVIEW COMPLEX **Permit Date:** 

(actual) FRS Number: 110064622207

**Facility Contact:** 

**Facility Description:** new propane dehydrogenation (PDH) unit and a new polypropylene (PP) production unit: (1) The action SIC Code:

concerns the authorization for the PDH unit is under TCEO Project No. 286455 with assigned Permit Nos. 152181, PSDTX1540, GHGPSDTX182, and N264. (2) The action concerns the authorization for the PP unit is under TCEO Project No. 286467 with assigned Permit Nos. 152184, PSDTX1542, GHGPSDTX183 and N266. evaluated as a single project for purposes of evaluating major NSR. The project is subject to Nonattainment New Source Review (NNSR) requirements for significant increases of VOC (an ozone precursor) and is subject to Prevention of Significant Deterioration (PSD) requirements for CO and particulate (PM, PM10 and PM2.5). Affected units with no modifications include the wastewater treatment

system (WWTS) and C3 Splitter project of the Olefin plants

**Permit Type:** A: New/Greenfield Facility NAICS Code: 325199

**Permit URL:** 

**EPA Region:** 6 **COUNTRY:** USA

**Facility County: HARRIS** 

**Facility State:** TX

**Facility ZIP Code:** 

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) **Permit Issued By:** 

MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Other Agency Ms. Xuan Zhao, (512) 239-1664, Xuan.Zhao@tceq.texas.gov

**Contact Info:** 

**Permit Notes:** Other listed FRSN 110006531397

**Boundary Type: Affected Boundaries:** Class 1 Area State: **Boundary:** Distance:

CLASS1 AR Caney Creek > 250 km

## Process/Pollutant Information

**PROCESS NAME:** Process Vents

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{MACT}$  ,  $\operatorname{SIP}$ 

**Control Method:** (A) Elevated Flare, MPGF

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

PROCESS NAME: Multi Point Ground Flare

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, SIP

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, SIP

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Elevated Flare

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, SIP

**Control Method:** (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Tetrachloride

**CAS Number:** 56-23-5

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Vis-broken Process Vents

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: MACT, SIP

**Control Method:** (A) thermal oxidizer

Est. % Efficiency: 99.990
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Thermal Oxidizer

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

Primary Fuel: natural gas

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0200 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) SCR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 50.0000 PPM 3% O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0070 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0070 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0070 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices, design, natural gas fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Fixed Roof Storage Tanks

**Process Type:** 42.005 (Petroleum Liquid Storage in Fixed Roof Tanks)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

Control Method: (P) painted white, submerged fill

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Fugitive Components

**Process Type:** 50.007 (Petroleum Refining Equipment Leaks/Fugitive Emissions)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 500.0000 PPMV

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: NSPS, SIP

Control Method: (P) 28LAER & 28PI

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 500.0000 PPMV

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: NSPS, SIP
Control Method: (P) LDAR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Cooling Tower

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1: Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: N **Case-by-Case Basis:** LAER Other Applicable Requirements: SIP **Control Method:** (P) nondirect Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes: POLLUTANT NAME:** Particulate matter, total (TPM) **CAS Number:** PM **Test Method:** Unspecified ( Particulate Matter (PM) ) **Pollutant Group(s): Emission Limit 1:** 0.0050 % DRIFT **Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: N **Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Control Method:** (P) drift eliminators Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0\$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 % DRIFT

**Emission Limit 2:** 6000.0000 PPMV TDS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 % DRIFT

Emission Limit 2: 6000.0000 PPMV TDS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** WASTEWATER SYSTEM

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: SIP

**Control Method:** (P) Process wastewater drains shall be equipped with water seals or equivalent. Quarterly visual or physical

inspections on water seals.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** EMERGENCY DIESEL ENGINE

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra-low sulfur diesel

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: SIP

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b), 100 HR / YR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1:
Emission Limit 2:
Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** NSPS, SIP

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1:
Emission Limit 2:
Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, SIP

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Tier 4 exhaust emission standards specified at 40 CFR § 1039.101(b)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** PRODUCT HANDLING

**Process Type:** 99.190 (Other Fugitive Dust Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) BAGHOUSE

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) BAGHOUSE

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: LIQUID PRODUCT LOADING

**Process Type:** 42.010 (Volatile Organic Liquid Marketing (except 42.009))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Zinc / Zinc Compounds

CAS Number: 7440-66-6
Test Method: Unspecified

Pollutant Group(s): (Heavy Metals, InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: SIP

Control Method: (B) annual DOT pressure tests per requirements of 49 CFR §180.407 for the tank trucks. Collected vapors from

the truck loading of any compound with the VOC vapor pressure at or beyond 0.5 psia at 95oF or at the actual

liquid temperature will be controlled by the multi-point ground flare

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

**RBLC ID:** TX-0865 (draft) Date

**Determination** 

Last Updated:

10/03/2019 Permit Number: N264, PSDTX1540,

GHGPSDTX182

**Permit Date:** 

09/09/2019 (actual)

FRS Number:

110064622207

2869

SIC Code:

**NAICS Code:** 325199

**COUNTRY:** 

USA

Corporate/Company

EQUISTAR CHEMICALS, LP

Name:

**Facility Name:** EQUISTAR CHEMICALS CHANNELVIEW COMPLEX

**Facility Contact:** 

KIM FOLEY 281-862-5150

**Facility Description:** 

new PDH unit. Includea four heaters, one ground flare, one steam-assisted elevated flare, one cooling tower, one CCR vent scrubber, one ammonia vent scrubber, catalyst handling systems,

several tanks/drums, wastewater, fugitive components and MSS activities.

**Permit Type:** 

A: New/Greenfield Facility

**Permit URL:** 

6 **EPA Region:** 

**Facility County:** 

**HARRIS** 

**Facility State:** 

TX

**Facility ZIP Code:** 

**Permit Issued By:** 

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name) MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Other Agency Contact Ms. Xuan Zhao, (512) 239-1664, Xuan.Zhao@tceq.texas.gov

Info:

**Permit Notes:** 

**Affected Boundaries:** 

**Boundary Type:** CLASS1

Class 1 Area State: AR

**Boundary:** Caney Creek

Distance: > 250 km

#### Process/Pollutant Information

Process Heaters **PROCESS NAME:** 

**Process Type:** 19.600 (Misc. Boilers, Furnaces, Heaters)

**Primary Fuel:** natural gas, process gas **Throughput:** 202.00 MMBtu/hr

**Process Notes:** 

Nitrogen Oxides (NOx) **POLLUTANT NAME:** 

**CAS Number:** 10102 Unspecified **Test Method:** 

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 5.0000 PPMVD 3% O2 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT, SIP
Control Method: (A) SCR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 5.5000 LB/MMSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: MACT

Control Method: (P) Good combustion practices, clean fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 50.0000 PPMV 3% O2 1-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

**Control Method:** (P) Good combustion practices and low-emitting gaseous fuel.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): ( Greenhouse Gasses (GHG) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Good combustion practices and low-emitting gaseous fuel.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** 0.0070 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Good combustion practices and low-emitting gaseous fuel.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0070 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Good combustion practices and low-emitting gaseous fuel.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0070 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Good combustion practices and low-emitting gaseous fuel.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Process Heaters MSS

**Process Type:** 19.600 (Misc. Boilers, Furnaces, Heaters)

Primary Fuel: natural gas, process gas

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0100 LB/MMBTU 1-HR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT, SIP
Control Method: (B) SCR

**Pollutant/Compliance Notes:** All other pollutant limits the same as routine operations

#### Process/Pollutant Information

**PROCESS NAME:** PDH PROCESS VENTS

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** NATURAL GAS

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

Control Method: (A) MULTIPOINT GROUND FLARE

Est. % Efficiency: 99.500
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** 

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS

Throughput:

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

**Control Method:** (P) Good combustion practices, proper design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT

Control Method: (P) Good combustion practices, proper design and operation

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Good combustion practices, proper design and operation

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Good combustion practices, proper design and operation

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** MEROX PROCESS VENTS

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

Primary Fuel: NATURAL GAS

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT

**Control Method:** (A) ELEVATED FLARE

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** 

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

Control Method: (P) Good combustion practices, proper design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT

Control Method: (P) Good combustion practices, proper design and operation

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Good combustion practices, proper design and operation

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Good combustion practices, proper design and operation

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FUGITIVES

**Process Type:** 50.007 (Petroleum Refining Equipment Leaks/Fugitive Emissions)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: METHOD 21

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) 28LAER & 28PI LDAR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS , NESHAP , SIP Control Method: (P) 28LAER, 28PI LDAR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** COOLING TOWER

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 42.0000 PPBW

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: SIP

Control Method: (P) INDIRECT DESIGN

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 6000.0000 PPMW TDS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (B) DRIFT ELIMINATORS

Est. % Efficiency: 0.005
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 6000.0000 PPMW TDS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (B) DRIFT ELIMINATORS

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 6000.0000 PPMW TDS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (B) DRIFT ELIMINATORS

Est. % Efficiency: 0.005
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Storage Tanks

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

**Control Method:** (P) All tanks contain a material with a VOC partial pressure less than 0.5 psia or have a capacity less than 500

gallons Fixed roof tanks painted white with submerged fill.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS NAME: Wastewater Collection and Treatment

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

Control Method: (B) Process wastewater will be collected via covered sumps and hard-piped to the wastewater tank (EPN:

TK8511) and then piped to the existing enhanced wastewater treatment facility (under NSR Permit No. 49120) at the site that will treat the VOCs contained in the wastewater to remove greater than 90%. The wastewater tank

emissions are routed to the multi-point ground flare for control at an efficiency of 98%.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Equipment MSS

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

**Control Method:** (P) The uncontrolled equipment clearing is estimated on the total process vessel volume in the unit and a BACT

concentration of 10,000 ppmv to opening

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## **Facility Information**

**RBLC ID: Date Determination** TX-0863 (draft)

Last Updated:

10/11/2019

**Corporate/Company Name:** THE DOW CHEMICAL COMPANY **Permit Number:** 

153106 AND N268

**Facility Name:** POLYETHYLENE 7 FACILITY **Permit Date:** FRS Number: 09/03/2019 (actual)

**Facility Contact:** FRAN FALCON 979-238-9978

Not Found

**Facility Description:** Addition of new polyethylene manufacturing plant at the Dow Freeport Site.

SIC Code:

2869

B: Add new process to existing facility **Permit Type:** 

TX

**NAICS Code:** 

325998

**Permit URL: EPA Region:** 

6

**COUNTRY:** 

**USA** 

**Facility County: BRAZORIA** 

**Facility State:** 

**Facility ZIP Code:** 

**Permit Issued By:** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Mr. Lou Malarcher, P.E., (512) 239-1151, Louis.Malarcher@tceq.texas.gov **Other Agency Contact Info:** 

**Permit Notes:** 

**Affected Boundaries: Boundary Type:** Class 1 Area State: **Boundary: Distance:** 

CLASS1

OR

Crater Lake NP

> 250 km

#### Process/Pollutant Information

**PROCESS NAME:** Furnace

**Process Type:** 13.900 (Other Fuels and Combinations (¿100 million BTU/H)(e.g., solid/liquid, liquid/gas))

**Primary Fuel:** natural gas

**Throughput:** 84.27 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102 **Test Method:** Unspecified **Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0340 LB/MMBTU HOURLY
Emission Limit 2: 0.0200 LB/MMBTU ANNUAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Ultra low NOX burners and effluent gas recirculation

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

**Control Method:** (P) Control of VOC in vent gas from pellet hoppers, blenders, and silos monitored with a continuous FID

Est. % Efficiency: 99.500
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Yes

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 50.0000 PPMV 3% O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 5.0000 GR/100 DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) LIMIT SULFUR IN FUEL

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS NAME:

**COOLING TOWER** 

D. T.			
Process Type:	99.009 (Industrial Process Cooling Towers)		
Primary Fuel:			
Throughput:	0		
Process Notes:			
POLLUTANT NAME:	Volatile Organic Compounds (VOC)		
CAS Number:	VOC		
<b>Test Method:</b>	Unspecified		
Pollutant Group(s):	( Volatile Organic Compounds (VOC) )		
<b>Emission Limit 1:</b>			
<b>Emission Limit 2:</b>			
<b>Standard Emission:</b>			
Did factors, other then air pollut	ion technology considerations influence the BACT decisions: N		
Case-by-Case Basis:	LAER		
Other Applicable Requirements:			
Control Method:	(P) Monthly monitoring cooling water for VOC content		
Est. % Efficiency:			
<b>Cost Effectiveness:</b>	0 \$/ton		
<b>Incremental Cost Effectiveness:</b>	0 \$/ton		
Compliance Verified:	Unknown		
Pollutant/Compliance Notes:			
POLLUTANT NAME:	Particulate matter, total < 10 μ (TPM10)		
CAS Number:	PM		
<b>Test Method:</b>	Unspecified		
Pollutant Group(s):	( Particulate Matter (PM) )		
Emission Limit 1:			
<b>Emission Limit 2:</b>			
Standard Emission:			
Did factors, other then air pollut	ion technology considerations influence the BACT decisions: N		
Case-by-Case Basis:	BACT-PSD		
Other Applicable Requirements:			
Control Method:	(P) DRIFT ELIMINATOR		
Est. % Efficiency:			

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) DRIFT ELIMINATOR

Est. % Efficiency: 0.001
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS NAME: WASTEWATER LOADING RACK

**Process Type:** 99.999 (Other Miscellaneous Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

Control Method: (P) Tank trucks pressure rated greater than 15 psig and loading operations routed to flare for control of emissions

Est. % Efficiency: 100.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Low Pressure HDPE and LLDPE solution phase plant

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 39.3000 LB/MMLB MONTHLY
Emission Limit 2: 30.0000 LB/MMLB ANNUAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT, SIP

Control Method: (B) Process vents upstream of pellet dryer controlled; dryer vents uncontrolled and emissions added to residual

VOC emissions; residual VOC head space testing after dryer and at product loadout.

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GR/DSCF

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT

**Control Method:** (A) Visible inspection of filter condition and connection with separate filter for each rail car spreader vent

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Visible inspection of filter condition and connection with separate filter for each rail car spreader vent

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS NAME: FUGITIVES

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: LAER
Other Applicable Requirements: NSPS, SIP
Control Method: (P) 28 MID

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME:

Storage tanks content vapor pressure less than 0.5 psia

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: SIP

Control Method: (A) FLARE
Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Storage tanks content vapor pressure greater than or equal to 0.5 psia

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: NSPS, SIP

**Control Method:** (B) IFR AND FLARE

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** PROCESS VENTS

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Process vents that fluctuate in VOC concentration not suitable for recycle or use as fuel

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: SIP

Control Method: (A) FLARE
Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

Process	/Polluta	ant Info	rmation
1 100000	1 Ollun	<i><b>4111 11110</b></i>	IIIIuuioi

PROCESS NAME: FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: OH-0378 (final) Date Determination

Corporate/Company Name: PTTGCA PETROCHEMICAL COMPLEX Permit Number: P0124972

Facility Name: PTTGCA PETROCHEMICAL COMPLEX Permit Date: 12/21/2018 (actual)

Facility Contact: PAUL WOJCIECHOWSKI (713)871-5730 PAUL.W@PTTGCAMERICA.COM FRS Number: Not Found

Facility Description:Petrochemical ComplexSIC Code:2869

**Permit Type:** A: New/Greenfield Facility **NAICS Code:** 325110

**Permit URL:** 

EPA Region: 5 COUNTRY: USA

**Facility County:** BELMONT

Facility State: OH
Facility ZIP Code: 43947

**Permit Issued By:** OHIO ENVIRONMENTAL PROTECTION AGENCY (Agency Name)

MICHAEL MALESKI(Agency Contact) (614) 644-3613 Michael.Maleski@epa.ohio.gov

**Permit Notes:** Initial installation permit for a world-scale petrochemical complex composed of ethylene and ethylene-based derivative plants to

manufacture high-density polyethylene (HDPE) and linear low-density polyethylene/HDPE (LLDPE/HDPE) with the following design capacities: Ethylene Plant: 1,500 KT/year; HDPE Units: two (2) trains of 350 KT/year for each train; and LLDPE/HDPE Units: two (2) trains of 450 KT/year for each train. The petrochemical complex will also involve onsite railcar and truck loading, supporting utilities, infrastructure, storage tanks, logistics facilities, and facilities to produce and/or provide required natural gas, water, air, nitrogen, steam,

and electricity to support the operation of process units.

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 544.0000 (Tons/Year)
Nitrogen Oxides (NOx) 164.0000 (Tons/Year)
Particulate Matter (PM) 120.0000 (Tons/Year)
Sulfur Oxides (SOx) 23.0000 (Tons/Year)
Volatile Organic Compounds (VOC) 396.0000 (Tons/Year)

### Process/Pollutant Information

**PROCESS** Ethane Cracking Furnaces, 6 identical (B001 - B006)

NAME:

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** Tail gas and natural gas **Throughput:** 552.00 MMBTU/H

**Process Notes:** Six identical Ethane Cracking Furnaces 1 through 6; 552 MMBtu/hour cracking furnace burning tail gas, natural gas and ethane (backup only)

equipped with low-NOx burners (LNBs) and controlled by selective catalytic reduction (SCR). Limits are for single furnace except as noted.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0135 LB/MMBTU HOURLY MAXIMUM. SEE NOTES.

**Emission Limit 2:** 7.4500 LB/H SEE NOTES.

Standard Emission: 0.0100 LB/MMBTU AS ROLLING 12-MONTH AVG. SEE NOTES. Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) low-NOx burners and SCR with a control efficiency of at least 90%

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 0.0135 lb/MMBtu as an hourly maximum during normal operation and 7.45 lbs/hr, excluding periods of startup,

shutdown and hot steam standby. 0.010 lb/MMBtu as a rolling, 12-month average, excluding periods of startup, shutdown and hot steam standby. 0.015 lb/MMBtu as a 3-hour average and 2.18 lbs/hr during decoking. 0.050 lb/MMBtu as a three-hour average and 7.20 lbs/hr during periods of startup, shutdown and hot steam standby.

144.00 tons of NOx per rolling, 12-month period for B001-B006, combined.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Other
Other Test Method: CEM

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 19.3200 LB/H SEE NOTES.

**Emission Limit 2:** 5.0800 LB/H DURING DECOKING. SEE NOTES.

**Standard Emission:** 0.0350 LB/MMBTU AS ROLLING 12-MONTH AVG. SEE NOTES.

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Proper burner design and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: 0.035 lb/MMBtu as a 12-month rolling average and 19.32 lbs/hr. 5.08 lbs/hr during decoking. 500.00 tons of CO

per rolling, 12-month period for B001-B006, combined.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.4200 LB/H

**Emission Limit 2:** 122.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 0.0080 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Proper burner design and good combustion practices

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 122.00 tons of VOC per rolling, 12-month period for B001-B006, combined.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0190 LB/MMBTU DURING DECOKING. SEE NOTES

**Emission Limit 2:** 2.7600 LB/H SEE NOTES.

Standard Emission: 0.0050 LB/MMBTU EXCLUDING DECOKING. SEE NOTES.

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) All modes except decoking: Proper burner design and good combustion practices. Decoking: Good

combustion and operating practices to limit the decoking event of each cracking furnace to maximum of 10 times

a year (totally 360 hours per year each furnace) and recycling of decoking vent stream to furnace firebox.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 72.59 tons of PE per rolling, 12-month period for B001-B006, combined.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.0100 LB/MMBTU DURING DECOKING. SEE NOTES.

Emission Limit 2: 2.7600 LB/H EXCLUDING DECOKING. SEE NOTES.

**Standard Emission:** 0.0050 LB/MMBTU EXCLUDING DECOKING. SEE NOTES.

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) All modes except decoking: Proper burner design and good combustion practices. Decoking: Good

combustion and operating practices to limit the decoking event of each cracking furnace to maximum of 10 times

a year (totally 360 hours per year each furnace) and recycling of decoking vent stream to furnace firebox.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: 0.005 lb/MMBtu and 2.76 lbs/hr, excluding periods of decoking. 0.010 lb/MMBtu and 1.45 lbs/hr during

decoking. 71.89 tons per rolling, 12-month period for B001-B006, combined

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 5 and 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0100 LB/MMBTU DURING DECOKING. SEE NOTES.

Emission Limit 2: 2.7600 LB/H EXCLUDING DECOKING. SEE NOTES.

Standard Emission: 0.0050 LB/MMBTU EXCLUDING DECOKING. SEE NOTES.

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) All modes except decoking: Proper burner design and good combustion practices. Decoking: Good

combustion and operating practices to limit the decoking event of each cracking furnace to maximum of 10 times

a year (totally 360 hours per year each furnace) and recycling of decoking vent stream to furnace firebox.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: 0.005 lb/MMBtu and 2.76 lbs/hr, excluding periods of decoking. 0.010 lb/MMBtu and 1.45 lbs/hr during

decoking. 71.89 tons per rolling, 12-month period for B001-B006, combined.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 1673240.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of low carbon gaseous fuels, good combustion and operating practices, and pollution prevention means

by improving energy efficiency

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 1,673,240 tons of carbon dioxide equivalents (CO2e) per rolling, 12-month period for B001-B006, combined.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

Standard Emission: 20.0000 % OPACITY AS A 6 MINUTE AVERAGE. SEE NOTE Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) All modes except decoking: Proper burner design and good combustion practices. Decoking: Good

combustion and operating practices to limit the decoking event of each cracking furnace to maximum of 10 times

a year (totally 360 hours per year each furnace) and recycling of decoking vent stream to furnace firebox.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 20 percent opacity as a 6-minute average, except as specified by rule.

#### Process/Pollutant Information

**PROCESS** Natural Gas and Ethane-Fired Steam Boilers (B007 - B009)

NAME:

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** Natural gas and ethane

**Throughput:** 400.00 MMBTU/H

Process Notes: Three identical Steam Boilers 1 through 3; natural gas and ethane-fired steam boiler equipped with ultra-low-NOx burners and flue gas recirculation

(FGR) with a maximum fuel input rating of 400 million BTU/hour and an average fuel input rating of 160 MMBtu/hour. Limits are for single boiler

except as noted.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Other
Other Test Method: CEM

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0200 LB/MMBTU DURING STARTUP AND SHUTDOWN. SEE NOTES.

**Emission Limit 2:** 4.0000 LB/H AS ROLLING 30-DAY AVG. SEE NOTES.

Standard Emission: 0.0100 LB/MMBTU AS ROLLING 30-DAY AVG. SEE NOTES. Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) ultra-low NOx burners (ULNB) and flue gas recirculation (FGR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 0.010 lb/MMBtu of actual heat input as a rolling, 30-day average and 4.00 lbs/hr, excluding periods of startup

and shutdown. 0.020 lb/MMBtu of actual heat input and 8.00 lbs/hr during periods of startup and shutdown.

8.76 tons of NOx per rolling, 12-month period from B007-B009, combined

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Other
Other Test Method: CEM

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 14.0000 LB/H

Emission Limit 2: 30.7000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

Standard Emission: 0.0350 LB/MMBTU AS ROLLING 12-MONTH AVG. SEE NOTES.

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Proper burner design, good combustion practices and use of only natural gas with ethane backup

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 0.035 lb/MMBtu of actual heat input as a rolling, 12-month average and 14.00 lbs/hr. 30.70 tons of CO per

rolling, 12-month period from B007-B009, combined.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 2.1600 LB/H

**Emission Limit 2:** 4.7300 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

Standard Emission: 0.0054 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Proper burner design, good combustion practices and use of only natural gas with ethane backup

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 4.73 tons of VOC per rolling, 12-month period for B007-B009, combined.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 2.0000 LB/H

**Emission Limit 2:** 4.3800 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

Standard Emission: 0.0050 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Proper burner design, good combustion practices and use of only natural gas with ethane backup

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 4.38 tons per rolling, 12-month period for B007-B009, combined.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 2.0000 LB/H

**Emission Limit 2:** 4.3800 T/YR PER ROLLING 12 MONTH PERIOD, SEE NOTES.

**Standard Emission:** 0.0050 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Proper burner design, good combustion practices and use of only natural gas with ethane backup

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 4.38 tons per rolling, 12-month period for B007-B009, combined.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 5 and 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 2.0000 LB/H

**Emission Limit 2:** 4.3800 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 0.0050 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Proper burner design, good combustion practices and use of only natural gas with ethane backup

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 4.38 tons per rolling, 12-month period for B007-B009, combined.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 102500.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) low carbon intensity gaseous fuels, good combusting and operating practices, and efficiency improvement

measures to maximize overall unit energy efficiency.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 102,500 tons of carbon dioxide equivalents (CO2e) per rolling, 12-month period for B007-B009, combined.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

Pollutant Group(s): Emission Limit 1: **Emission Limit 2:** 

Standard Emission: 20.0000 % OPACITY AS A 6 MINUTE AVERAGE. SEE NOTE Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (P) Proper burner design, good combustion practices and use of only natural gas with ethane backup

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 20 percent opacity as a 6-minute average, except as specified by rule.

# Process/Pollutant Information

**PROCESS** Ethylene Manufacturing Unit (P801)

NAME:

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: 1,500 KTA ethylene manufacturing process; includes feed preheating, cracking, quenching, compression, caustic scrubbing, precooling/drying,

separation, and hydrogenation. Process vents, storage tanks, and startup/shutdown/maintenance/upsets controlled by flare and thermal oxidizer.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions and thermal oxidizer

(TO) achieving a destruction efficiency of 99.5% for VOC emissions. See notes.

**Est. % Efficiency:** 99.500

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** (a) use of closed vent systems controlled with high pressure (HP) flare (emission unit P003) achieving a

destruction efficiency of 98% for VOC emissions from the following: (i) startup/shutdown/maintenance/upsets;

(ii) spent caustic degassing drum; (iii) spent caustic drain drum; and (iv) pressure relief valve (PRV)

leaks/releases. (b) use of thermal oxidizer (TO, emission units P001 and P002) achieving a destruction efficiency of 99.5% for VOC emissions from the following: (i) quench water drain drum; (ii) wet air oxidation unit; (iii) dimethyl disulphide (DMDS) tank; and (iv) wash oil tank; (c) tail gas from the hydrogenation section shall be used as fuel gas for firing in process cracking furnace(s); (d) implementation of a facility specific program reducing fugitive component equipment leaks for applicable component equipment in the ethylene

manufacturing unit; (e) implementation of a program to minimize flaring.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Implementation of a facility specific program reducing fugitive component equipment leaks for applicable

component equipment in the ethylene manufacturing unit. See emission unit P807 (Fugitive Emissions).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS** High-Density Polyethylene Manufacturing Unit #1 (P802)

NAME:

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: 350 KTA high density polyethylene (HDPE) manufacturing process; includes catalyst activation & feed systems, reactor system,

separation/degassing, solvent recovery and pelletizing sections, pellet blending, handling, and storage.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0980 LB/MMBTU SEE NOTES.

**Emission Limit 2:** 0.5100 LB/H SEE NOTES.

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Limits represent combustion emissions associated with the jackets of two catalyst activator furnaces. 4.47 tons

per rolling 12-month period for the two activator furnaces combined.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0820 LB/MMBTU SEE NOTES.

**Emission Limit 2:** 0.4300 LB/H SEE NOTES.

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Emission limitations represent combustion emissions associated with the jackets of two catalyst activator

furnaces. 3.74 tons per rolling 12-month period for the two activator furnaces combined.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU SEE NOTES.

**Emission Limit 2:** 0.0300 LB/H SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) Use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98%

for VOC emissions, use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions, implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line and implementation of a program to minimize

flaring.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** For combustion emissions associated with the jackets of two catalyst activator furnaces: (i) 0.0054 lb/MMBtu;

(ii) 0.03 lb/hr (for each individual furnace); and (iii) 0.25 ton per rolling 12-month period for two activator furnaces combined. For HDPE manufacturing process for VOC emissions other than the catalyst activation furnace combustion emissions: i. use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions from the following: (a) intermediate flash slurry sampler; (b) LSR lights condenser; (c) heavies column; and (d) pressure relief valve (PRV) leaks/releases; ii. use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions from the following: (a) LPSR condensate separator; and (b) powder conveying package vent; iii. residual VOC in the polyethylene resin exiting the extruder shall be less than 80 ppmv; iv. The combined VOC emissions for all HDPE manufacturing process vents without VOC control (e.g. not vented to flare or TO) shall not exceed 28.00 tons per rolling 12-month period; v. implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line (see C.12.b)(2)b. and c.); and

vi. implementation of a program to minimize flaring.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Fabric filtration at 0.005 gr/dscf for two catalyst activator jacket vents, two catalyst filter vents, extruder

vent, additive vent, six additive feeder vents. Fabric filtration at 0.002 gr/dscf for pellet conveying hopper vent, pellet hopper vent, 24 pellet & off-spec blender/silo vents, and pellet dryer fan vent (only vent requiring stack test). Catalyst activation system vents associated with co-catalyst container changes shall be controlled by passing vent streams through a seal pot containing mineral oil resulting only in emissions of nitrogen gas used in

co-catalyst transfer.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Combustion emissions associated with the jackets of two catalyst activator furnaces: 0.0075 lb/MMBtu, 0.04

lb/h (each individual furnace), 0.34 ton per rolling 12-month period for two activator furnaces combined. Catalyst activator jacket vents (R-201A and B): 0.005 gr/dscf, 0.10 lb/h and 0.44 ton per rolling 12-month period. Catalyst filter vents (S-203A and B): 0.005 gr/dscf, 0.0015 lb/hr and 0.006 ton per rolling 12-month period. Extruder vent filter (3S-603): 0.005 gr/dscf, 0.015 lb/hr and 0.065 ton per rolling 12-month period. Additive vent filter (3S-604): 0.005 gr/dscf, 0.04 lb/hr and 0.175 ton per rolling 12-month period. Additive feeder vents (3Q-602A through F): 0.005 gr/dscf, 0.001 lb/hr and 0.0044 ton per rolling 12-month period for each individual vent (6 individual vents). Pellet conveying hopper vent (3V-607): 0.002 gr/dscf, 0.004 lb/hr and 0.0175 ton per rolling 12-month period. Pellet hopper vent (3V-702): 0.002 gr/dscf, 0.06 lb/hr and 0.263 tons per rolling 12-month period. Pellet & off-spec blender/silo vents (3V-701A through E) & (PE1-19): 0.002 gr/dscf, 0.036 lb/hr & 0.162 ton per rolling 12-month period for six vents combined. Pellet dryer fan vent (3C-603):

0.002 gr/dscf, 0.134 lb/hr & 0.587 ton per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 201A and 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for two catalyst activator jacket vents, two catalyst filter vents, extruder

vent, additive vent, six additive feeder vents. Fabric filtration at 0.002 gr/dscf for pellet conveying hopper vent, pellet hopper vent, 24 pellet & off-spec blender/silo vents, and pellet dryer fan vent (only vent requiring stack test). Catalyst activation system vents associated with co-catalyst container changes shall be controlled by passing vent streams through a seal pot containing mineral oil resulting only in emissions of nitrogen gas used in

co-catalyst transfer.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Combustion emissions associated with the jackets of two catalyst activator furnaces: 0.0075 lb/MMBtu, 0.04

lb/h (each individual furnace), 0.34 ton per rolling 12-month period for two activator furnaces combined. Catalyst activator jacket vents (R-201A and B): 0.005 gr/dscf, 0.10 lb/h and 0.44 ton per rolling 12-month period. Catalyst filter vents (S-203A and B): 0.005 gr/dscf, 0.0015 lb/hr and 0.006 ton per rolling 12-month period. Extruder vent filter (3S-603): 0.005 gr/dscf, 0.015 lb/hr and 0.065 ton per rolling 12-month period. Additive vent filter (3S-604): 0.005 gr/dscf, 0.04 lb/hr and 0.175 ton per rolling 12-month period. Additive feeder vents (3Q-602A through F): 0.005 gr/dscf, 0.001 lb/hr and 0.0044 ton per rolling 12-month period for each individual vent (6 individual vents). Pellet conveying hopper vent (3V-607): 0.002 gr/dscf, 0.004 lb/hr and 0.0175 ton per rolling 12-month period. Pellet hopper vent (3V-702): 0.002 gr/dscf, 0.06 lb/hr and 0.263 tons per rolling 12-month period. Pellet & off-spec blender/silo vents (3V-701A through E) & (PE1-19): 0.002 gr/dscf, 0.036 lb/hr & 0.162 ton per rolling 12-month period for six vents combined. Pellet dryer fan vent (3C-603):

0.002 gr/dscf, 0.134 lb/hr & 0.587 ton per rolling 12-month period.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (A) Fabric filtration at 0.005 gr/dscf for two catalyst activator jacket vents, two catalyst filter vents, extruder

vent, additive vent, six additive feeder vents. Fabric filtration at 0.002 gr/dscf for pellet conveying hopper vent, pellet hopper vent, 24 pellet & off-spec blender/silo vents, and pellet dryer fan vent (only vent requiring stack test). Catalyst activation system vents associated with co-catalyst container changes shall be controlled by passing vent streams through a seal pot containing mineral oil resulting only in emissions of nitrogen gas used in

co-catalyst transfer.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Visible particulate emissions from each process vent stack controlled with fabric filtration shall not exceed five

percent opacity, as a six-minute average. No visible emissions of fugitive particulate from the discharge of co-catalyst material to the atmospheric sand pit. SIP: 20 percent opacity as a 6-minute average, except as

specified by rule.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 117.0000 LB/MMBTU

**Emission Limit 2:** 5335,0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Low carbon intensity gaseous fuels, good combusting and operating practices, and efficiency improvement

measures to maximize overall unit energy efficiency.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 5335 t/yr per rolling 12-month period for two activator furnaces combined.

**PROCESS** High-Density Polyethylene Manufacturing Unit #2 (P803)

NAME:

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 350 KTA high density polyethylene (HDPE) manufacturing process; includes catalyst activation & feed systems, reactor system,

separation/degassing, solvent recovery and pelletizing sections, pellet blending, handling, and storage.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 117.0000 LB/MMBTU

**Emission Limit 2:** 5335.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Low carbon intensity gaseous fuels, good combusting and operating practices, and efficiency improvement

measures to maximize overall unit energy efficiency.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 5335 t/yr per rolling 12-month period for two activator furnaces combined.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0820 LB/MMBTU SEE NOTES.

**Emission Limit 2:** 0.4300 LB/H SEE NOTES.

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Emission limitations represent combustion emissions associated with the jackets of two catalyst activator

furnaces. 3.74 tons per rolling 12-month period for the two activator furnaces combined.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0980 LB/MMBTU SEE NOTES.

**Emission Limit 2:** 0.5100 LB/H SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Limits represent combustion emissions associated with the jackets of two catalyst activator furnaces. 4.47 tons

per rolling 12-month period for the two activator furnaces combined.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Fabric filtration at 0.005 gr/dscf for two catalyst activator jacket vents, two catalyst filter vents, extruder

vent, additive vent, six additive feeder vents. Fabric filtration at 0.002 gr/dscf for pellet conveying hopper vent, pellet hopper vent, 24 pellet & off-spec blender/silo vents, and pellet dryer fan vent (only vent requiring stack test). Catalyst activation system vents associated with co-catalyst container changes shall be controlled by passing vent streams through a seal pot containing mineral oil resulting only in emissions of nitrogen gas used in

co-catalyst transfer.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Combustion emissions associated with the jackets of two catalyst activator furnaces: 0.0075 lb/MMBtu, 0.04

lb/h (each individual furnace), 0.34 ton per rolling 12-month period for two activator furnaces combined. Catalyst activator jacket vents (R-201A and B): 0.005 gr/dscf, 0.10 lb/h and 0.44 ton per rolling 12-month period. Catalyst filter vents (S-203A and B): 0.005 gr/dscf, 0.0015 lb/hr and 0.006 ton per rolling 12-month period. Extruder vent filter (3S-603): 0.005 gr/dscf, 0.015 lb/hr and 0.065 ton per rolling 12-month period. Additive vent filter (3S-604): 0.005 gr/dscf, 0.04 lb/hr and 0.175 ton per rolling 12-month period. Additive feeder vents (3Q-602A through F): 0.005 gr/dscf, 0.001 lb/hr and 0.0044 ton per rolling 12-month period for each individual vent (6 individual vents). Pellet conveying hopper vent (3V-607): 0.002 gr/dscf, 0.004 lb/hr and 0.0175 ton per rolling 12-month period. Pellet hopper vent (3V-702): 0.002 gr/dscf, 0.06 lb/hr and 0.263 tons per rolling 12-month period. Pellet & off-spec blender/silo vents (3V-701A through E) & (PE1-19): 0.002 gr/dscf, 0.036 lb/hr & 0.162 ton per rolling 12-month period for six vents combined. Pellet dryer fan vent (3C-603):

0.002 gr/dscf, 0.134 lb/hr & 0.587 ton per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 201A and 202

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Fabric filtration at 0.005 gr/dscf for two catalyst activator jacket vents, two catalyst filter vents, extruder

vent, additive vent, six additive feeder vents. Fabric filtration at 0.002 gr/dscf for pellet conveying hopper vent, pellet hopper vent, 24 pellet & off-spec blender/silo vents, and pellet dryer fan vent (only vent requiring stack test). Catalyst activation system vents associated with co-catalyst container changes shall be controlled by passing vent streams through a seal pot containing mineral oil resulting only in emissions of nitrogen gas used in

co-catalyst transfer.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Combustion emissions associated with the jackets of two catalyst activator furnaces: 0.0075 lb/MMBtu, 0.04

lb/h (each individual furnace), 0.34 ton per rolling 12-month period for two activator furnaces combined. Catalyst activator jacket vents (R-201A and B): 0.005 gr/dscf, 0.10 lb/h and 0.44 ton per rolling 12-month period. Catalyst filter vents (S-203A and B): 0.005 gr/dscf, 0.0015 lb/hr and 0.006 ton per rolling 12-month period. Extruder vent filter (3S-603): 0.005 gr/dscf, 0.015 lb/hr and 0.065 ton per rolling 12-month period. Additive vent filter (3S-604): 0.005 gr/dscf, 0.04 lb/hr and 0.175 ton per rolling 12-month period. Additive feeder vents (3Q-602A through F): 0.005 gr/dscf, 0.001 lb/hr and 0.0044 ton per rolling 12-month period for each individual vent (6 individual vents). Pellet conveying hopper vent (3V-607): 0.002 gr/dscf, 0.004 lb/hr and 0.0175 ton per rolling 12-month period. Pellet hopper vent (3V-702): 0.002 gr/dscf, 0.06 lb/hr and 0.263 tons per rolling 12-month period. Pellet & off-spec blender/silo vents (3V-701A through E) & (PE1-19): 0.002 gr/dscf, 0.036 lb/hr & 0.162 ton per rolling 12-month period for six vents combined. Pellet dryer fan vent (3C-603):

 $0.002\ gr/dscf,\, 0.134\ lb/hr\ \&\ 0.587$  ton per rolling 12-month period.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (A) Fabric filtration at 0.005 gr/dscf for two catalyst activator jacket vents, two catalyst filter vents, extruder

vent, additive vent, six additive feeder vents. Fabric filtration at 0.002 gr/dscf for pellet conveying hopper vent, pellet hopper vent, 24 pellet & off-spec blender/silo vents, and pellet dryer fan vent (only vent requiring stack test). Catalyst activation system vents associated with co-catalyst container changes shall be controlled by passing vent streams through a seal pot containing mineral oil resulting only in emissions of nitrogen gas used in

co-catalyst transfer.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Visible particulate emissions from each process vent stack controlled with fabric filtration shall not exceed five

percent opacity, as a six-minute average. No visible emissions of fugitive particulate from the discharge of co-catalyst material to the atmospheric sand pit. SIP: 20 percent opacity as a 6-minute average, except as

specified by rule.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s):( Volatile Organic Compounds (VOC) )Emission Limit 1:0.0054 LB/MMBTU SEE NOTES.

**Emission Limit 2:** 0.0300 LB/H SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) Use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98%

for VOC emissions, use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions, implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line and implementation of a program to minimize

flaring.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** For combustion emissions associated with the jackets of two catalyst activator furnaces: (i) 0.0054 lb/MMBtu;

(ii) 0.03 lb/hr (for each individual furnace); and (iii) 0.25 ton per rolling 12-month period for two activator furnaces combined. For HDPE manufacturing process for VOC emissions other than the catalyst activation furnace combustion emissions: i. use of closed vent system controlled with high pressure (HP) flare achieving a destruction efficiency of 98% for VOC emissions from the following: (a) intermediate flash slurry sampler; (b) LSR lights condenser; (c) heavies column; and (d) pressure relief valve (PRV) leaks/releases; ii. use of thermal oxidizer (TO) achieving a destruction efficiency of 99.5% for VOC emissions from the following: (a) LPSR condensate separator; and (b) powder conveying package vent; iii. residual VOC in the polyethylene resin exiting the extruder shall be less than 80 ppmv; iv. The combined VOC emissions for all HDPE manufacturing process vents without VOC control (e.g. not vented to flare or TO) shall not exceed 28.00 tons per rolling

12-month period; v. implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene manufacturing line (see C.12.b)(2)b. and c.); and vi. implementation of a program to minimize flaring.

#### Process/Pollutant Information

**PROCESS** Linear Low/High-Density Polyethylene Manufacturing Unit #3 (P804)

NAME:

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 450 KTA linear low-density polyethylene (LLDPE)/high density polyethylene (HDPE) manufacturing process; includes purification (ethylene & raw

material), catalyst system, reactor system, resin degassing and vent recovery, seed bed & granular storage system, and additive handling and pelletizing.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 80.0000 PPM BY VOLUME. SEE NOTES.

**Emission Limit 2:** 36.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (B) Thermal oxidizer with a destruction efficiency of 99.5% from analyzer vents, degassing column vents,

ethylene purification, low product purge bin vent filter, and high pressure accumulator vent. Closed vent system controlled with flare (high pressure (HP) and/or low pressure (LP)) with a destruction efficiency of 98% from butene dryer regen vent, hexene dryer regen vent, ICA dryer regen vent, ethylene deoxo regen vent, ethylene dryers regen vent, ethylene systems shutdown, non-emergency reactor vents, and product purge bin vent filter. Pressure safety valve (PSV) leaks/releases from raw materials supply pressure PSVs, purification PSVs, reaction PSVs, resin degassing PSVs, and vent recovery PSVs. Implementation of facility specific program reducing fugitive component equipment leaks including applicable component equipment in the polyethylene

manufacturing line. Implementation of a program to minimize flaring.

Est. % Efficiency: 99.500
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** Residual VOC in the polyethylene resin exiting the granular resin surge hopper shall be less than 80 ppmv. The

combined VOC emissions for all LLDPE/HDPE manufacturing process vents without VOC control (e.g. not

vented to flare or TO) shall not exceed 36.00 tons per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for the catalyst vent filter (Y-4901) and receiver bin filter vent (Y-5657) &

seed bed filter vents (Y-5651 through 5655). Fabric filtration at 0.002 gr/dscf for granular resin surge hopper vent filter (D-6210), bag dump stations/dump hoppers vent filter (Y-6231 through 6235), talc surge bin filter (Y-6251), mixer vent filter (Y-6260), pellet conveying hopper (PE3-07), pellet hopper (PE3-08), and pellet blending/off-spec blending silos (PE3-09 through PE3-15). Pellet dryer vent (Y-7010) shall not exceed a

maximum outlet concentration of 0.002 gr/dscf.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Catalyst vent filter (Y-4901): 0.005 gr/dscf, 0.035 lb/hr and 0.153 ton per rolling 12-month period. Receiver bin

filter vent (Y-5657) & seed bed filter vents (Y-5651 through 5655): 0.005 gr/dscf, 0.08 lb/hr and 0.35 ton per rolling 12-month period. Granular resin surge hopper vent filter (D-6210): 0.002 gr/dscf, 0.042 lb/hr and 0.184 ton per rolling 12-month period. Bag dump stations/dump hoppers vent filter (Y-6231 through 6235): 0.002 gr/dscf, 0.0515 lb/hr and 0.226 ton per rolling 12-month period. Talc surge bin filter (Y-6251): 0.002 gr/dscf, 0.012 lb/hr and 0.053 ton per rolling 12-month period. Mixer vent filter (Y-6260): 0.002 gr/dscf, 0.009 lb/hr and 0.039 ton per rolling 12-month period. Pellet conveying hopper (PE3-07): 0.002 gr/dscf, 0.004 lb/hr and 0.018 ton per rolling 12-month period. Pellet hopper (PE3-08): 0.002 gr/dscf, 0.06 lb/hr and 0.26 ton per rolling 12-month period. Pellet blending/off-spec blending silos (PE3-09 through PE3-15): 0.002 gr/dscf, 0.048 lb/hr and 0.208 ton per rolling 12-month period for all vents combined. Pellet dryer vent (Y-7010) shall not exceed a maximum outlet concentration of 0.002 gr/dscf, 0.05 lb/hr and 0.11 ton per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Other

Other Test Method: Methods 201A and 202

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for the catalyst vent filter (Y-4901) and receiver bin filter vent (Y-5657) &

seed bed filter vents (Y-5651 through 5655). Fabric filtration at 0.002 gr/dscf for granular resin surge hopper vent filter (D-6210), bag dump stations/dump hoppers vent filter (Y-6231 through 6235), talc surge bin filter (Y-6251), mixer vent filter (Y-6260), pellet conveying hopper (PE3-07), pellet hopper (PE3-08), and pellet blending/off-spec blending silos (PE3-09 through PE3-15). Pellet dryer vent (Y-7010) shall not exceed a

maximum outlet concentration of 0.002 gr/dscf.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Catalyst vent filter (Y-4901): 0.005 gr/dscf, 0.035 lb/hr and 0.153 ton per rolling 12-month period. Receiver bin

filter vent (Y-5657) & seed bed filter vents (Y-5651 through 5655): 0.005 gr/dscf, 0.08 lb/hr and 0.35 ton per rolling 12-month period. Granular resin surge hopper vent filter (D-6210): 0.002 gr/dscf, 0.042 lb/hr and 0.184 ton per rolling 12-month period. Bag dump stations/dump hoppers vent filter (Y-6231 through 6235): 0.002 gr/dscf, 0.0515 lb/hr and 0.226 ton per rolling 12-month period. Talc surge bin filter (Y-6251): 0.002 gr/dscf, 0.012 lb/hr and 0.053 ton per rolling 12-month period. Mixer vent filter (Y-6260): 0.002 gr/dscf, 0.009 lb/hr and 0.039 ton per rolling 12-month period. Pellet conveying hopper (PE3-07): 0.002 gr/dscf, 0.004 lb/hr and 0.018 ton per rolling 12-month period. Pellet hopper (PE3-08): 0.002 gr/dscf, 0.06 lb/hr and 0.26 ton per rolling 12-month period. Pellet blending/off-spec blending silos (PE3-09 through PE3-15): 0.002 gr/dscf, 0.048 lb/hr and 0.208 ton per rolling 12-month period for all vents combined. Pellet dryer vent (Y-7010) shall not exceed a maximum outlet concentration of 0.002 gr/dscf, 0.05 lb/hr and 0.11 ton per rolling 12-month period.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 5.0000 % OPACITY AS A 6 MINUTE AVERAGE. SEE NOTE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for the catalyst vent filter (Y-4901) and receiver bin filter vent (Y-5657) &

seed bed filter vents (Y-5651 through 5655). Fabric filtration at 0.002 gr/dscf for granular resin surge hopper vent

filter (D-6210), bag dump stations/dump hoppers vent filter (Y-6231 through 6235), talc surge bin filter (Y-6251), mixer vent filter (Y-6260), pellet conveying hopper (PE3-07), pellet hopper (PE3-08), and pellet blending/off-spec blending silos (PE3-09 through PE3-15). Pellet dryer vent (Y-7010) shall not exceed a

maximum outlet concentration of 0.002 gr/dscf.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 5% opacity as a 6 minute average from the following stacks: Catalyst vent filter (Y-4901), Receiver bin filter

vent (Y-5657) & seed bed filter vents (Y-5651 through 5655), Granular resin surge hopper vent filter (D-6210), Bag dump stations/dump hoppers vent filter (Y-6231 through 6235), Talc surge bin filter (Y-6251), Mixer vent filter (Y-6260), Pellet conveying hopper (PE3-07), Pellet hopper (PE3-08), Pellet blending/off-spec blending

silos (PE3-09 through PE3-15), and Pellet dryer vent (Y-7010)

## Process/Pollutant Information

**PROCESS** Linear Low/High-Density Polyethylene Manufacturing Unit #4 (P805)

NAME:

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 450 KTA linear low-density polyethylene (LLDPE)/high density polyethylene (HDPE) manufacturing process; includes purification (ethylene & raw

material), catalyst system, reactor system, resin degassing and vent recovery, seed bed & granular storage system, and additive handling and pelletizing.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 80.0000 PPM BY VOLUME. SEE NOTES.

**Emission Limit 2:** 36.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (B) Thermal oxidizer with a destruction efficiency of 99.5% from analyzer vents, degassing column vents,

ethylene purification, low product purge bin vent filter, and high pressure accumulator vent. Closed vent system controlled with flare (high pressure (HP) and/or low pressure (LP)) with a destruction efficiency of 98% from butene dryer regen vent, hexene dryer regen vent, ICA dryer regen vent, ethylene deoxo regen vent, ethylene dryers regen vent, ethylene systems shutdown, non-emergency reactor vents, and product purge bin vent filter. Pressure safety valve (PSV) leaks/releases from raw materials supply pressure PSVs, purification PSVs, reaction PSVs, resin degassing PSVs, and vent recovery PSVs. Implementation of facility specific program reducing

fugitive component equipment leaks including applicable component equipment in the polyethylene

manufacturing line. Implementation of a program to minimize flaring.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: Residual VOC in the polyethylene resin exiting the granular resin surge hopper shall be less than 80 ppmv. The

combined VOC emissions for all LLDPE/HDPE manufacturing process vents without VOC control (e.g. not

vented to flare or TO) shall not exceed 36.00 tons per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for the catalyst vent filter (Y-4902) and receiver bin filter vent (Y-5957) &

seed bed filter vents (Y-5651 through 5655). Fabric filtration at 0.002 gr/dscf for granular resin surge hopper vent filter (D-6510), bag dump stations/dump hoppers vent filter (Y-6531 through 6535), talc surge bin filter (Y-6551), mixer vent filter (Y-6560), pellet conveying hopper (PE4-07), pellet hopper (PE4-08), and pellet blending/off-spec blending silos (PE4-09 through PE4-15). Pellet dryer vent (Y-7310) shall not exceed a

maximum outlet concentration of 0.002 gr/dscf.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

Pollutant/Compliance Notes: Catalyst vent filter (Y-4902): 0.005 gr/dscf, 0.035 lb/hr and 0.153 ton per rolling 12-month period. Receiver bin

filter vent (Y-5957) & seed bed filter vents (Y-5651 through 5655): 0.005 gr/dscf, 0.08 lb/hr and 0.35 ton per rolling 12-month period. Granular resin surge hopper vent filter (D-6510): 0.002 gr/dscf, 0.042 lb/hr and 0.184 ton per rolling 12-month period. Bag dump stations/dump hoppers vent filter (Y-6531 through 6535): 0.002 gr/dscf, 0.0515 lb/hr and 0.226 ton per rolling 12-month period. Talc surge bin filter (Y-6551): 0.002 gr/dscf, 0.012 lb/hr and 0.053 ton per rolling 12-month period. Mixer vent filter (Y-6560): 0.002 gr/dscf, 0.009 lb/hr and 0.039 ton per rolling 12-month period. Pellet conveying hopper (PE4-07): 0.002 gr/dscf, 0.004 lb/hr and 0.018 ton per rolling 12-month period. Pellet hopper (PE4-08): 0.002 gr/dscf, 0.06 lb/hr and 0.26 ton per rolling 12-month period. Pellet blending/off-spec blending silos (PE4-09 through PE4-15): 0.002 gr/dscf, 0.048 lb/hr and 0.208 ton per rolling 12-month period for all vents combined. Pellet dryer vent (Y-7310) shall not exceed a maximum outlet concentration of 0.002 gr/dscf, 0.05 lb/hr and 0.11 ton per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 201A and 202

Pollutant Group(s): (Particulate Matter (PM))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for the catalyst vent filter (Y-4902) and receiver bin filter vent (Y-5957) &

seed bed filter vents (Y-5651 through 5655). Fabric filtration at 0.002 gr/dscf for granular resin surge hopper vent filter (D-6510), bag dump stations/dump hoppers vent filter (Y-6531 through 6535), talc surge bin filter (Y-6551), mixer vent filter (Y-6560), pellet conveying hopper (PE4-07), pellet hopper (PE4-08), and pellet blending/off-spec blending silos (PE4-09 through PE4-15). Pellet dryer vent (Y-7310) shall not exceed a

maximum outlet concentration of 0.002 gr/dscf.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Catalyst vent filter (Y-4902): 0.005 gr/dscf, 0.035 lb/hr and 0.153 ton per rolling 12-month period. Receiver bin

filter vent (Y-5957) & seed bed filter vents (Y-5651 through 5655): 0.005 gr/dscf, 0.08 lb/hr and 0.35 ton per rolling 12-month period. Granular resin surge hopper vent filter (D-6510): 0.002 gr/dscf, 0.042 lb/hr and 0.184 ton per rolling 12-month period. Bag dump stations/dump hoppers vent filter (Y-6531 through 6535): 0.002 gr/dscf, 0.0515 lb/hr and 0.226 ton per rolling 12-month period. Talc surge bin filter (Y-6551): 0.002 gr/dscf, 0.012 lb/hr and 0.053 ton per rolling 12-month period. Mixer vent filter (Y-6560): 0.002 gr/dscf, 0.009 lb/hr and 0.039 ton per rolling 12-month period. Pellet conveying hopper (PE4-07): 0.002 gr/dscf, 0.004 lb/hr and 0.018 ton per rolling 12-month period. Pellet hopper (PE4-08): 0.002 gr/dscf, 0.06 lb/hr and 0.26 ton per rolling 12-month period. Pellet blending/off-spec blending silos (PE4-09 through PE4-15): 0.002 gr/dscf, 0.048 lb/hr and 0.208 ton per rolling 12-month period for all vents combined. Pellet dryer vent (Y-7310) shall not exceed a maximum outlet concentration of 0.002 gr/dscf, 0.05 lb/hr and 0.11 ton per rolling 12-month period.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

Pollutant Group(s): Emission Limit 1:

**Emission Limit 2:** 

**Standard Emission:** 5.0000 % OPACITY AS A 6 MINUTE AVERAGE. SEE NOTE **Did factors, other then air pollution technology considerations influence the BACT decisions:** U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.005 gr/dscf for the catalyst vent filter (Y-4902) and receiver bin filter vent (Y-5957) &

seed bed filter vents (Y-5651 through 5655). Fabric filtration at 0.002 gr/dscf for granular resin surge hopper vent filter (D-6510), bag dump stations/dump hoppers vent filter (Y-6531 through 6535), talc surge bin filter (Y-6551), mixer vent filter (Y-6560), pellet conveying hopper (PE4-07), pellet hopper (PE4-08), and pellet blending/off-spec blending silos (PE4-09 through PE4-15). Pellet dryer vent (Y-7310) shall not exceed a

maximum outlet concentration of 0.002 gr/dscf.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 5% opacity as a 6 minute average from the following stacks: Catalyst vent filter (Y-4902), Receiver bin filter

vent (Y-5957) & seed bed filter vents (Y-5651 through 5655), Granular resin surge hopper vent filter (D-6510), Bag dump stations/dump hoppers vent filter (Y-6531 through 6535), Talc surge bin filter (Y-6551), Mixer vent filter (Y-6560), Pellet conveying hopper (PE4-07), Pellet hopper (PE4-08), Pellet blending/off-spec blending

silos (PE4-09 through PE4-15), and Pellet dryer vent (Y-7310)

### Process/Pollutant Information

**PROCESS** OSBL Thermal Oxidizers (P001 and P002)

NAME:

**Process** 63.999 (Other Polymer and Resin Manufacturing Sources)

Type:

**Primary** Natural gas

**Fuel:** 

**Throughput:** 6.20 MMBTU/H

**Process** Two identical OSBL Thermal Oxidizers 1 and 2; 6.2 MMBtu/hr thermal oxidizer. Thermal oxidizer control is used to meet control requirements

**Notes:** associated with BACT, NSPS, BAT, MACT, and NESHAP for affected facility operations, storage tanks, and process vents. For efficient permitting

structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805, and J001. It should be noted that the thermal oxidizer control system consists of two identical thermal oxidizers (P001 and P002). One thermal oxidizer will be operational and providing required control at all times while the other unit is ready for use as a backup. Limits are for single

oxidizer except as noted.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.5100 LB/H SEE NOTES.

**Emission Limit 2:** 2.2200 T/YR PER ROLLING 12 MONTH PERIOD, SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) use of pipeline natural gas for TO pilots

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.6100 LB/H SEE NOTES.

**Emission Limit 2:** 2.6700 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of pipeline natural gas for TO pilots

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: EPA/OAR Mthd 201A and 202

Pollutant Group(s): (Particulate Matter (PM))

Emission Limit 1: 0.0500 LB/H SEE NOTES.

**Emission Limit 2:** 0.2000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) use of pipeline natural gas for TO pilots

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method:Methods 201A and 202Pollutant Group(s):( Particulate Matter (PM) )Emission Limit 1:0.0500 LB/H SEE NOTES.

**Emission Limit 2:** 0.2000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of pipeline natural gas for TO pilots

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0300 LB/H SEE NOTES.

**Emission Limit 2:** 0.1400 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805, and J001. The

control efficiency is 99.5%.

Est. % Efficiency: 99.500
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 3161.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of pipeline natural gas for TO pilots

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

Standard Emission: 5.0000 % OPACITY AS A 6 MINUTE AVERAGE. SEE NOTE Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of pipeline natural gas for TO pilots

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Thermal oxidizer control is used to meet control requirements associated with BACT, New Source Performance

Standards (NSPS), BAT, Maximum Achievable Control Technology, and National Emission Standards for Hazardous Air Pollutants for affected facility operations, storage tanks, and process vents. For efficient permitting structure, the thermal oxidizer has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The thermal oxidizer controls VOC emissions from units P801, P802, P803, P804, P805,

and J001.

## Process/Pollutant Information

**PROCESS** High Pressure Ground Flare (P003)

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** Natural gas

**Throughput:** 1.80 MMBTU/H

**Process** 1.8 MMBtu/hr high-pressure, multi-point, staged ground flare. The high pressure (HP) ground flare is used to meet control requirements associated with

**Notes:** BACT, NSPS, BAT, and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground flare has been

permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing

associated with control requirements. The high pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 2.9171 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: The high pressure (HP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The high

pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.5360 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The high pressure (HP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The high

pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0590 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The high pressure (HP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The high

pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0590 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The high pressure (HP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The high

pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 4.4940 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) The high pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805. The

control efficiency is 98%

**Est. % Efficiency:** 98.000

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

Pollutant/Compliance Notes: The high pressure (HP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The high

pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 923.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: The high pressure (HP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the HP ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The high

pressure (HP) flare controls VOC emissions from units P801, P802, P803, P804, and P805.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s): Emission Limit 1: Emission Limit 2: **Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** No visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

#### Process/Pollutant Information

**PROCESS** Low Pressure Ground Flare (P004)

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** Natural gas

**Throughput:** 0.78 MMBTU/H

**Process** 0.78 MMBtu/hr low-pressure, multi-point, staged ground flare. The low pressure (LP) ground flare is used to meet control requirements associated with

**Notes:** BACT, NSPS, BAT, and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground flare has been

permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing

associated with control requirements. The low pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 1.9700 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) The low pressure (LP) flare controls VOC emissions from units P804 and P805. The control efficiency is

98%.

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 1.2600 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.2320 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0260 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: The low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0260 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 400.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) use of natural gas as pilot light fuel

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT,

and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground

flare has been permitted as a separate and individual emissions unit to contain limitations, operational

restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) use of natural gas as pilot light fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** No visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. The

low pressure (LP) ground flare is used to meet control requirements associated with BACT, NSPS, BAT, and MACT for affected facility operations and process vents. For efficient permitting structure, the ECU ground flare has been permitted as a separate and individual emissions unit to contain limitations, operational restrictions, monitoring, record keeping, reporting, and testing associated with control requirements. The low

pressure (LP) flare controls VOC emissions from units P804 and P805.

## Process/Pollutant Information

**PROCESS** Wastewater Collection and Treatment (P806)

NAME:

**Process** 64.006 (Wastewater Collection & Treatment)

**Type:** 

**Primary** 

Fuel:

**Throughput:** 0

Process
Notes:

Wastewater treatment plant and associated collection and treatment systems for treatment of wastewater generated in the ethylene manufacturing process, the high-density polyethylene units, the linear low-density polyethylene units, the air separation unit, and all sanitary wastewater; includes an oily water treatment plant, a process biological treatment plant and a sanitary treatment plant; emissions sources include: a 12% NaClO2 storage tank (T-5205) and a 98% sulfuric acid storage tank (T-3502) vented to atmosphere, a wet air oxidation unit, an equalization tank (T-6503), an oily wastewater storage tank (T-6501), a corrugated plate interceptor (CPI) package, a waste oil tank (T-6502), a dissolved gas floatation (DGF) unit and GCF/CPI sump covered and vented to one primary and one backup 1.0 MMBtu/hr thermal oxidizers

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0100 LB/H

**Emission Limit 2:** 0.0200 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

**Control Method:** (B) i. Use an enhanced biodegradation unit to maintain the annual benzene quantity from facility waste at less

than 10 megagrams (MG; 11 tons) by combining waste streams with greater than 10 ppmw benzene with waste streams with less than 10 ppmw benzene to form a combined waste stream with a benzene concentration less than 10 ppmw; ii. Route emissions from wastewater generated in the ethylene manufacturing process to a thermal oxidizer designed to achieve >99.5% destruction efficiency for volatile organic compounds (VOC); iii. Cover and route emissions from the process wastewater equalization tank (T-6503), the waste oil drum (T-6502), the oily wastewater storage tank (T-6501) and the wet air oxidation unit to a thermal oxidizer designed to achieve >99.5% destruction efficiency for VOC; iv. Emissions from wastewater generated in the high-density polyethylene units

must comply with the applicable requirements of 40 CFR Part 63, Subpart FFFF.

Est. % Efficiency:99.500Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0980 LB/H

**Emission Limit 2:** 0.4300 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0820 LB/H

**Emission Limit 2:** 0.3600 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0080 LB/H

**Emission Limit 2:** 0.0300 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0080 LB/H

**Emission Limit 2:** 0.0300 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

**CAS Number:** PM

**Test Method:** Other

Other Test Method: Methods 201 and 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0080 LB/H

**Emission Limit 2:** 0.0300 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

Standard Emission:

5.0000 % OPACITY AS A 6 MINUTE AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 513.0000 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Fugitive Emissions (P807)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** Facility-wide fugitive emissions from equipment and process unit leaks

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 99.3800 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, MACT

**Control Method:** 

(A) Enhanced connector monitoring requirements to the most stringent leak detection and repair (LDAR) regulation applicable to affected equipment/process units. The following identifies LDAR requirements for affected equipment/process units which have been determined to representative of BACT: i. 40 CFR Part 63 Subpart UU as applicable to the ethylene manufacturing process with enhanced connector monitoring; ii. 40 CFR Part 60 Subpart VVa as applicable to the polyethylene manufacturing process with enhanced connector monitoring; The LDAR programs indicated above which are representative of BACT shall implement the following enhanced connector monitoring requirements: i. connector monitoring subsequent to the initial monitoring required shall be performed on a quarterly basis; ii. if following the initial four (4) consecutive quarters, the percent leaking connectors in a process unit is less than 0.5 percent during the most recent quarterly monitoring event, then the frequency of connector monitoring can be reduced to semi-annual; iii. if following two (2) consecutive semi-annual periods, the percent leaking connectors in a process unit is less than 0.5 percent during the most recent semi-annual monitoring event, then the frequency of connector monitoring can be reduced to annual. iv. If more than or equal to 0.5 percent of the connectors in a process unit are determined to be leaking during any one of the semi-annual or annual monitoring events then the frequency of monitoring shall be returned to a quarterly basis.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Enhanced connector monitoring requirements to the most stringent leak detection and repair (LDAR) regulation applicable to affected equipment/process units. The following identifies LDAR requirements for affected equipment/process units which have been determined to representative of BACT: i. 40 CFR Part 63 Subpart UU as applicable to the ethylene manufacturing process with enhanced connector monitoring; ii. 40 CFR Part 60 Subpart VVa as applicable to the polyethylene manufacturing process with enhanced connector monitoring; The LDAR programs indicated above which are representative of BACT shall implement the following enhanced connector monitoring requirements: i. connector monitoring subsequent to the initial monitoring required shall be performed on a quarterly basis; ii. if following the initial four (4) consecutive quarters, the percent leaking connectors in a process unit is less than 0.5 percent during the most recent quarterly monitoring event, then the frequency of connector monitoring can be reduced to semi-annual; iii. if following two (2) consecutive semi-annual periods, the percent leaking connectors in a process unit is less than 0.5 percent during the most recent semi-annual monitoring event, then the frequency of connector monitoring can be reduced to annual. iv. If more than or equal to 0.5 percent of the connectors in a process unit are determined to be leaking during any one of the semi-annual monitoring events then the frequency of monitoring shall be returned to a quarterly basis.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 35.0000 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) i. an LDAR program for leaks of methane from equipment and piping components in tail gas (fuel gas) and

natural gas service. The LDAR program will involve sensory monitoring methods for leaks; ii. methane contained in leaks associated with fugitive VOCs will be minimized by the implementation of BACT for fugitive leaks of

VOC.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** CO2e emissions from leaks of methane from equipment and piping components in tail gas (fuel gas) and natural

gas service at the entire facility shall not exceed 35 tons per rolling 12-month period.

#### Process/Pollutant Information

**PROCESS NAME:** Light and Heavy Pygas Railcar Loading (J001)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Loading of railcars (2 loading arms) with light and heavy pygas controlled by the OSBL thermal oxidizer (P001 or P002).

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (A) Thermal oxidizer (TO) achieving a destruction efficiency of >99.5%. The TO controlling heavy and light

pygas railcar loading operations is permitted as a separate and individual emissions unit (emissions unit P001 or P002). For efficient permitting structure, the applicable operational restrictions, monitoring, record keeping, reporting, and testing associated with TO control are contained within the requirements of emissions unit P001 and P002. A separate emissions unit (P807) associated with fugitive leaks of VOC, HAP\*, VHAP/Benzene\*, and GHGs\* from all component equipment at the facility subject to the leak control and repair regulations above has been established. For efficient permitting structure, the applicable requirements (limitations, operational restrictions, monitoring, record keeping, reporting, and testing) associated with equipment leak control and repair

for VOC, HAP\*, VHAP/Benzene\*, and GHGs\* are contained within the requirements of emissions unit P807.

Est. % Efficiency: 99.500
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The TO controlling heavy and light pygas railcar loading operations is permitted as a separate and individual

emissions unit (emissions unit P001 or P002). For efficient permitting structure, the applicable operational restrictions, monitoring, record keeping, reporting, and testing associated with TO control are contained within the requirements of emissions unit P001 and P002. A separate emissions unit (P807) associated with fugitive leaks of VOC, HAP\*, VHAP/Benzene\*, and GHGs\* from all component equipment at the facility subject to the leak control and repair regulations above has been established. For efficient permitting structure, the applicable requirements (limitations, operational restrictions, monitoring, record keeping, reporting, and testing) associated with equipment leak control and repair for VOC, HAP\*, VHAP/Benzene\*, and GHGs\* are contained within the

requirements of emissions unit P807.

## Process/Pollutant Information

**PROCESS NAME:** HDPE Railcar Loading 1 (P901)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Railcar loading of high-density polyethylene (HDPE) pellets controlled with baghouse

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.002 gr/dscf for PE Railcar Loading Bin (PE1-21), PE Railcar Loading Bin (PE2-21), PE

Railcar Loading (PE1-22), and PE Railcar Loading (PE2-22). Fabric filtration at 0.001 gr/dscf for the pellet

cleaning package vent (PE-RPC).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pellutant/Compliance Notes: PE Railcar Loading Bin (PE1-21): 0.002 gr/dscf, 0.018 lb/hr and 0.081ton per rolling 12-month period. PE

Railcar Loading Bin (PE2-21): 0.002 gr/dscf, 0.018 lb/hr and 0.081 ton per rolling 12-month period. PE Railcar Loading (PE1-22): 0.002 gr/dscf, 0.0002 lb/hr and 0.0009 ton per rolling 12-month period. PE Railcar Loading (PE2-22): 0.002 gr/dscf, 0.0002 lb/hr and 0.0009 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE1-20): 0.002 gr/dscf, 0.018 lb/hr and 0.081 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE2-20): 0.002 gr/dscf, 0.018 lb/hr and 0.081 ton per rolling 12-month period. Pellet cleaning package vent (PE-RPC): 0.001 gr/dscf, 0.009 lb/hr and 0.038 ton per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.002 gr/dscf for PE Railcar Loading Bin (PE1-21), PE Railcar Loading Bin (PE2-21), PE

Railcar Loading (PE1-22), and PE Railcar Loading (PE2-22). Fabric filtration at 0.0005 gr/dscf for the pellet

cleaning package vent (PE-RPC).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: PE Railcar Loading Bin (PE1-21): 0.002 gr/dscf, 0.018 lb/hr and 0.081ton per rolling 12-month period. PE

Railcar Loading Bin (PE2-21): 0.002 gr/dscf, 0.018 lb/hr and 0.081 ton per rolling 12-month period. PE Railcar Loading (PE1-22): 0.002 gr/dscf, 0.0002 lb/hr and 0.0009 ton per rolling 12-month period. PE Railcar Loading (PE2-22): 0.002 gr/dscf, 0.0002 lb/hr and 0.0009 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE1-20): 0.002 gr/dscf, 0.018 lb/hr and 0.081 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE2-20): 0.002 gr/dscf, 0.018 lb/hr and 0.081 ton per rolling 12-month period. Pellet cleaning package vent (PE-RPC): 0.0005 gr/dscf, 0.004 lb/hr and 0.019 ton per rolling 12-month period.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s): Emission Limit 1:

**Emission Limit 1: Emission Limit 2:** 

**Standard Emission:** 5.0000 % OPACITY AS A 6 MINUTE AVERAGE.

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Fabric filtration at 0.002 gr/dscf for PE Railcar Loading Bin (PE1-21), PE Railcar Loading Bin (PE2-21), PE

Railcar Loading (PE1-22), and PE Railcar Loading (PE2-22). Fabric filtration at 0.001 gr PM10/dscf for the

pellet cleaning package vent (PE-RPC).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS** HDPE Railcar Loading 2 (P902)

NAME:

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Railcar loading of linear low-density polyethylene/high density polyethylene (LLDPE/HDPE) pellets controlled with baghouse. Loading operations

include pellet cleaning package process.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Fabric filtration at 0.002 gr/dscf for PE Railcar Loading Bin (PE3-17), PE Railcar Loading Bin (PE4-17), PE

Railcar Loading (PE3-18), and PE Railcar Loading (PE4-18). Fabric filtration at 0.001 gr/dscf for the pellet

cleaning package vent (PE-RPC).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** PE Railcar Loading Bin (PE3-17): 0.002 gr/dscf, 0.024 lb/hr and 0.0104 ton per rolling 12-month period. PE

Railcar Loading Bin (PE4-17): 0.002 gr/dscf, 0.024 lb/hr and 0.104 ton per rolling 12-month period. PE Railcar Loading (PE3-18): 0.002 gr/dscf, 0.0003 lb/hr and 0.0013 ton per rolling 12-month period. PE Railcar Loading (PE4-18): 0.002 gr/dscf, 0.003 lb/hr and 0.0013 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE3-16): 0.002 gr/dscf, 0.024 lb/hr and 0.104 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE4-16): 0.002 gr/dscf, 0.024 lb/hr and 0.104 ton per rolling 12-month period. Pellet

cleaning package vent (PE-RPC): 0.001 gr/dscf, 0.009 lb/hr and 0.038 ton per rolling 12-month period.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTES.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Fabric filtration at 0.002 gr/dscf for PE Railcar Loading Bin (PE3-17), PE Railcar Loading Bin (PE4-17),

PE Railcar Loading (PE3-18), and PE Railcar Loading (PE4-18). Fabric filtration at 0.0005 gr/dscf for the pellet

cleaning package vent (PE-RPC).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pellutant/Compliance Notes: PE Railcar Loading Bin (PE3-17): 0.002 gr/dscf, 0.024 lb/hr and 0.0104 ton per rolling 12-month period. PE

Railcar Loading Bin (PE4-17): 0.002 gr/dscf, 0.024 lb/hr and 0.104 ton per rolling 12-month period. PE Railcar Loading (PE3-18): 0.002 gr/dscf, 0.0003 lb/hr and 0.0013 ton per rolling 12-month period. PE Railcar Loading (PE4-18): 0.002 gr/dscf, 0.003 lb/hr and 0.0013 ton per rolling 12-month period. PE Pellet Elutricator & Cyclone Separator (PE3-16): 0.002 gr/dscf, 0.024 lb/hr and 0.104 ton per rolling 12-month period. PE Pellet Elutricator &

Cyclone Separator (PE4-16): 0.002 gr/dscf, 0.024 lb/hr and 0.104 ton per rolling 12-month period. Pellet cleaning package vent (PE-RPC): 0.0005 gr/dscf, 0.004 lb/hr and 0.019 ton per rolling 12-month period.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** Unspecified

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

**Standard Emission:** 5.0000 % OPACITY AS A 6 MINUTE AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Fabric filtration at 0.002 gr/dscf for PE Railcar Loading Bin (PE3-17), PE Railcar Loading Bin (PE4-17), PE

Railcar Loading (PE3-18), and PE Railcar Loading (PE4-18). Fabric filtration at 0.001 gr PM10/dsef for the

pellet cleaning package vent (PE-RPC).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**PROCESS NAME:** Facility Roadways (F001)

**Process Type:** 99.140 (Paved Roads)

**Primary Fuel:** 

**Throughput:** 182865.00 MI/YR

**Process Notes:** Facility roadways and parking areas; maximum of 182,865 annual vehicle miles traveled

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 1.8800 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) i. Pave all in-plant haul roads and parking areas; ii. Implement best management practices including posting

and limiting vehicle speeds to 20 miles per hour and water spraying or sweeping as needed based on the daily

inspections conducted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3800 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) i. Pave all in-plant haul roads and parking areas; ii. Implement best management practices including posting

and limiting vehicle speeds to 20 miles per hour and water spraying or sweeping as needed based on the daily

inspections conducted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0900 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) i. Pave all in-plant haul roads and parking areas; ii. Implement best management practices including posting

and limiting vehicle speeds to 20 miles per hour and water spraying or sweeping as needed based on the daily

inspections conducted

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s): Emission Limit 1: Emission Limit 2: **Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) i. Pave all in-plant haul roads and parking areas; ii. Implement best management practices including posting

and limiting vehicle speeds to 20 miles per hour and water spraying or sweeping as needed based on the daily

inspections conducted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** No visible particulate emissions from any paved roadway or parking area except for a period of time not to

exceed one minute during any 60-minute observation period.

## Process/Pollutant Information

**PROCESS** Firewater Pumps (P005 and P006)

NAME:

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel fuel
Throughput: 402.00 HP

Process Notes: Two identical Firewater Pumps 1 and 2; 300 kW (402 HP) emergency diesel-fired firewater pump engine. Limits are for single pump except as

noted.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.6400 LB/H SEE NOTES.

**Emission Limit 2:** 0.1300 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 3.0000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission limits are for non-methane hydrocarbon plus nitrogen oxides (NMHC + NOx). Non-methane

hydrocarbon plus nitrogen oxides (NMHC + NOx) emissions shall not exceed 4.0 g/kW-hour (3.0 g/HP-hour),

2.64 pounds per hour and 0.13 ton per rolling, 12-month period.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 2.6400 LB/H SEE NOTES.

**Emission Limit 2:** 0.1300 T/YR PER ROLLING 12 MONTH PERIOD, SEE NOTES.

**Standard Emission:** 3.0000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission limits are for non-methane hydrocarbon plus nitrogen oxides (NMHC + NOx). Non-methane

hydrocarbon plus nitrogen oxides (NMHC + NOx) emissions shall not exceed 4.0 g/kW-hour (3.0 g/HP-hour),

2.64 pounds per hour and 0.13 ton per rolling, 12-month period.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 2.3100 LB/H

**Emission Limit 2:** 0.1200 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 2.6000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** CO Standard limit is 3.5 g/kW-hr (2.6 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1300 LB/H

**Emission Limit 2:** 0.0066 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1300 LB/H

**Emission Limit 2:** 0.0066 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

**Control Method:** (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1300 LB/H

**Emission Limit 2:** 0.0066 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 23.0000 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operating practices (proper maintenance and operation)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

**Standard Emission:** 20.0000 % OPACITY AS A 6 MINUTE AVERAGE. SEE NOTE **Did factors, other then air pollution technology considerations influence the BACT decisions:** U

Case-by-Case Basis: N/A
Other Applicable Requirements: SIP

**Control Method:** (P) Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 20 percent opacity as a 6-minute average, except as specified by rule.

## Process/Pollutant Information

**PROCESS NAME:** Emergency Diesel-fired Generator Engine (P007)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel fuel
Throughput: 3353.00 HP

**Process Notes:** 2,500 kW (3,353 HP) emergency diesel-fired generator engine

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 37.4100 LB/H SEE NOTES.

**Emission Limit 2:** 1.8700 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 4.8000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission limits are for non-methane hydrocarbon plus nitrogen oxides (NMHC + NOx). Non-methane

hydrocarbon plus nitrogen oxides (NMHC + NOx) emissions shall not exceed 6.4 g/kW-hour (4.8 g/HP-hour),

37.41 pounds per hour and 1.87 tons per rolling, 12-month period.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 37.4100 LB/H SEE NOTES.

**Emission Limit 2:** 1.8700 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 4.8000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission limits are for non-methane hydrocarbon plus nitrogen oxides (NMHC + NOx). Non-methane

hydrocarbon plus nitrogen oxides (NMHC + NOx) emissions shall not exceed 6.4 g/kW-hour (4.8 g/HP-hour),

37.41 pounds per hour and 1.87 tons per rolling, 12-month period.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 19.2500 LB/H

**Emission Limit 2:** 0.9600 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 2.6000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** CO Standard limit is 3.5 g/kW-hr (2.6 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.1000 LB/H

**Emission Limit 2:** 0.0550 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.1000 LB/H

**Emission Limit 2:** 0.0550 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 1.1000 LB/H

**Emission Limit 2:** 0.0550 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.0150 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s): Emission Limit 1: Emission Limit 2:

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 20 percent during the acceleration mode; 15 percent during the lugging mode; and 50 percent during the peaks

in either the acceleration or lugging modes.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 200.0000 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operating practices (proper maintenance and operation)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** 1,000 kW Emergency Generators (P008 - P010)

NAME:

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel fuel
Throughput: 1341.00 HP

Process Notes: Three identical ECU Generators 1 to 3; 1,000 kW (1,341 HP) emergency diesel-fired generator engine. Limits are for single generator except as

noted.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 14.9600 LB/H SEE NOTES.

**Emission Limit 2:** 0.7500 T/YR PER ROLLING 12 MONTH PERIOD. SEE NOTES.

**Standard Emission:** 4.8000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission limits are for non-methane hydrocarbon plus nitrogen oxides (NMHC + NOx). Non-methane

hydrocarbon plus nitrogen oxides (NMHC + NOx) emissions shall not exceed 6.4 g/kW-hour (4.8 g/HP-hour),

14.96 pounds per hour and 0.75 ton per rolling, 12-month period.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 14.9600 LB/H SEE NOTES.

**Emission Limit 2:** 0.7500 T/YR PER ROLLING 12 MONTH PERIOD, SEE NOTES.

**Standard Emission:** 4.8000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission limits are for non-methane hydrocarbon plus nitrogen oxides (NMHC + NOx). Non-methane

hydrocarbon plus nitrogen oxides (NMHC + NOx) emissions shall not exceed 6.4 g/kW-hour (4.8 g/HP-hour),

14.96 pounds per hour and 0.75 ton per rolling, 12-month period.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 7.7000 LB/H

**Emission Limit 2:** 0.3900 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 2.6000 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** CO Standard limit is 3.5 g/kW-hr (2.6 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.4400 LB/H

**Emission Limit 2:** 0.0220 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.4400 LB/H

**Emission Limit 2:** 0.0220 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.4400 LB/H

**Emission Limit 2:** 0.0220 T/YR PER ROLLING 12 MONTH PERIOD

**Standard Emission:** 0.1500 G/BHP-H SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PM Standard limit is 0.20 g/kW-hr (0.15 g/hp-hr).

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

Pollutant Group(s):
Emission Limit 1:
Emission Limit 2:

**Standard Emission:** SEE NOTES

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good

combustion practices per the manufacturer's operating manual

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 20 percent during the acceleration mode; 15 percent during the lugging mode; and 50 percent during the peaks

in either the acceleration or lugging modes.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 80.0000 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good operating practices (proper maintenance and operation)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS** Cooling Tower (P011)

NAME:

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 13.88 MMGAL/H

**Process Notes:** Multi-cell, induced-draft, counter-flow evaporative cooling tower with side stream filtration system and high efficiency mist/drift eliminator.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.0700 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (B) High efficiency drift eliminator designed to achieve a 0.0005% drift rate and maintenance of a total

dissolved solids (TDS) content not to exceed 2,000 ppm in the circulating cooling water based on a rolling

12-month average.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 3.2200 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (B) High efficiency drift eliminator designed to achieve a 0.0005% drift rate and maintenance of a total

dissolved solids (TDS) content not to exceed 2,000 ppm in the circulating cooling water based on a rolling

12-month average.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (B) High efficiency drift eliminator designed to achieve a 0.0005% drift rate and maintenance of a total

dissolved solids (TDS) content not to exceed 2,000 ppm in the circulating cooling water based on a rolling

12-month average.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 42.5500 T/YR PER ROLLING 12 MONTH PERIOD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (P) (a) VOC content in cooling water shall not exceed a concentration of 0.7 lb/MMgal; (b) Compliance with

heat exchange leak monitoring and repair requirements for affected ethylene manufacturing process units

contained in 40 CFR Part 63 Subpart XX

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: TX-0838 (draft) Date

Determination

**Last Updated:** 11/04/2019

PSDTX860M2, GHGPSD

EXXONMOBIL OIL CORPORATION Permit Number: PSDTX843M2,

Name:

Corporate/Company

Facility Name: BEAUMONT CHEMICAL PLANT Permit Date: 06/13/2018 (actual)

Facility Contact: MARC RAIMBAULT 409-240-7046 FRS Number: 110000464131

**Facility Description:** Increase in supplemental natural gas to two flares in a cap, 3 other flares, with attendant SIC Code: 2869

increase in fugitive and MSS emissions from associated piping.

**Permit Type:** C: Modify process at existing facility **NAICS Code:** 325110

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

**Facility County:** JEFFERSON

**Facility State:** TX

**Facility ZIP Code:** 

**Permit Issued By:** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Other Agency Contact Mr. Joe Janecka, P.E., (512) 239-1541, Joseph.Janecka@tceq.texas.gov

Info:

**Permit Notes:** 

**Affected Boundaries: Boundary Type:** Class 1 Area State:

**Boundary:** Distance: CLASS1 Caney Creek > 250 kmAR

Process/Pollutant Information

**PROCESS NAME:** High and Low Pressure Flare cap

19.310 (Chemical Plant Flares) **Process Type:** 

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0 **Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Case-by-Case Basis: BACT-PSD** 

**Other Applicable Requirements:** NSPS

(P) Meet the design and operating requirements of 40 CFR §60.18. **Control Method:** 

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes:** NSPS YY

Carbon Dioxide Equivalent (CO2e) **POLLUTANT NAME:** 

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:UnknownPollutant/Compliance Notes:MACT YY

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

PROCESS NAME: UDEX FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput:	0
<b>Process Notes:</b>	
POLLUTANT NAME:	Carbon Monoxide
CAS Number:	630-08-0
Test Method:	Unspecified
<b>Pollutant Group(s):</b>	(InOrganic Compounds)
<b>Emission Limit 1:</b>	
Emission Limit 2.	

Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** PARAXYLENE FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: **Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1: Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** C & S FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Meet the design and operating requirements of 40 CFR §60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

#### **Pollutant/Compliance Notes:**

#### Process/Pollutant Information

**PROCESS NAME:** fugitives

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) 28MID LDAR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) 28MID LDAR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: TX-0815 (final) Date Determination

**Last Updated:** 11/16/2017

Corporate/Company Name: TOTAL PETROCHEMICALS & REFINING USA, INC. Permit Number: 122353, PSDTX1426,

GHGPSDTX114

Facility Name: PORT ARTHUR ETHANE SIDE CRACKER Permit Date: 01/17/2017 (actual)

Facility Contact: DOROTHY BARTOL (409) 963-6800 FRS Number: Not Found

Facility Description:Ethylene ProductionSIC Code:2869

**Permit Type:** B: Add new process to existing facility **NAICS Code:** 325110

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

**Facility County:** JEFFERSON

**Facility State:** TX

**Facility ZIP Code:** 

Permit Issued By: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Other Agency Contact Info: Mr. Daniel Guthrie, (512) 239-1319, Daniel.Guthrie@tceq.texas.gov

**Permit Notes:** 

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance: CLASS1 LA Breton > 250 km

Process/Pollutant Information

**PROCESS NAME:** Pyrolysis Furnaces

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS

Throughput: 1000.00 kT / YR

**Process Notes:** 7 furnaces

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 24.6800 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:UnknownPollutant/Compliance Notes:NSPS RRR

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0100 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (A) Low NOx burners with selective catalytic reduction

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 461.7000 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 30.8000 T/YR ROUTINE

**Emission Limit 2:** 1.9600 T/YR MSS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) Routine Operations - Good Combustion Practices, Firing Gaseous Fuel MSS-cyclones

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** High Pressure Process Vents

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, SIP

**Control Method:** (A) Multi-Point Ground Flare. Applicant will obtain an AMOC and AMEL prior to startup of the MPGF

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 99% - 2 carbons or less, 98% - 3 carbons or more Emission rate of 158.09 tpy is the sum of 59.93 tpy VOC for

routine operations and 98.16 tpy for MSS operations. NSPS NNN, RRR MACT YY SIP (115 Subchapter B)

# Process/Pollutant Information

**PROCESS NAME:** Low Pressure Process Vents

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, SIP

**Control Method:** (A) Thermal Oxidizer

Est. % Efficiency: 99.900
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NSPS NNN, RRR MACT YY SIP 115 Subchapter B

## Process/Pollutant Information

**PROCESS NAME:** Multi Point Ground Flare

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS

Throughput: 0

**Process Notes:** Applicant will obtain an AMOC and AMEL prior to startup of the MPGF

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 94.2700 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Good Combustion Practices & Design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission rate of 94.27 tpy is the sum of 35.86 tpy NOx for routine operations and 58.41 tpy NOx for MSS

operations.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 375.4600 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) .Good Combustion Practices & Design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission rate of 375.46 tpy is the sum of 142.82 tpy CO for routine operations and 232.64 tpy CO for MSS

operations.

## Process/Pollutant Information

**PROCESS NAME:** Thermal Oxidizer

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

Primary Fuel: NATURAL GAS

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 3.0000 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Good Combustion Practices and Design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 1.9000 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Good Combustion Practices and Design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Good Combustion Practices and Design

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** STORAGE TANKS

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Slop oil/wastewater/sludge fixed roof tanks routed a thermal oxidizer

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS , NESHAP , MACT , SIP Control Method: (A) THERMAL OXIDIZER

Est. % Efficiency: 99.900
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NSPS Kb NESHAP FF MACT YY, EEEE SIP 115 Subchapter B

#### Process/Pollutant Information

**PROCESS NAME:** Cooling Tower

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 27.9500 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (P) cooling water VOC concentration NON CONTACT

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:UnknownPollutant/Compliance Notes:MACT XX

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Drift Eliminators

Est. % Efficiency: 99.999
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FUGITIVES

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 17.2000 T/YR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Case-by-Case Basis: BACT-PSD** 

Other Applicable Requirements: NESHAP, MACT, SIP **Control Method:** (P) 28VHP LDAR Program

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton Unknown **Compliance Verified:** 

**Pollutant/Compliance Notes:** NSPS VVa, NESHAP J, V, FF, MACT UU, YY, SIP(115 Subchapter D

# **Facility Information**

**Facility Contact:** 

**Permit URL:** 

**RBLC ID:** LA-0323 (final) **Date Determination** 

ENRIQUE WEHLEN 9857858211 ENRIGUE.WEHLEN@MONSANTO.COM

**Last Updated:** 

05/11/2018

**Corporate/Company Name:** MONSANTO COMPANY **Permit Number:** 

PSD-LA-890

**Facility Name:** MONSANTO LULING PLANT **Permit Date:** FRS Number: 01/09/2017 (actual) 110067118274

SIC Code:

2879

**Facility Description:** Chemical Manufacture

**NAICS Code:** 

325320

D: Both B (Add new process to existing facility) &C (Modify process at existing **Permit Type:** 

facility) http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10460194&ob=yes

**EPA Region:** 

**COUNTRY:** 

USA

**Facility County:** ST. CHARLES PARISH

**Facility State:** LA

**Facility ZIP Code:** 70070

**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Dicamba Manufacturing Facility expansion project. **Permit Notes:** 

Class 1 Area State: **Affected Boundaries: Boundary Type: Boundary:** Distance:

CLASS1 LA Breton 100km - 50km **Pollutant Name: Facility-wide Emissions Increase:** 

**Facility-wide Emissions:** Carbon Monoxide 118.3000 (Tons/Year) Nitrogen Oxides (NOx)

Particulate Matter (PM)

Sulfur Oxides (SOx)

Volatile Organic Compounds (VOC)

84.2400 (Tons/Year)

20.8600 (Tons/Year)

1.6100 (Tons/Year)

39.4900 (Tons/Year)

#### Process/Pollutant Information

**PROCESS NAME:** No. 9 Boiler - Natural Gas Fired

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

**Throughput:** 325.00 MMBTU/h

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) Good combustion practices and Boiler MACT

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Method 201A

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0075 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, NSPS

**Control Method:** (P) Good combustion practices and Boiler MACT

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0350 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (A) Ultra Low NOx Burners

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0450 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) Good combustion practices and Boiler MACT

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 0.1670 LB/LB ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) Good combustion practices and energy efficient operation

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Units are lb of CO2e/lb of steam generated.

#### Process/Pollutant Information

**PROCESS NAME:** No. 10 Boiler - Natural Gas Fired

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

**Throughput:** 325.00 MMBTU/h

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201A and OTM 28

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) Good combustion practices and Boiler MACT

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Method 201A

 $Pollutant \ Group(s): \qquad \qquad (\ Particulate \ Matter \ (PM)\ )$ 

**Emission Limit 1:** 0.0075 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) Good combustion practices and Boiler MACT

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0350 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (A) Ultra Low NOx Burners

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0450 LB/MMBTU ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) Good combustion practices and Boiler MACT

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 0.1670 LB/LB ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) Good combustion practices and energy efficient operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Units are lb of CO2e/lb of steam generated.

## Process/Pollutant Information

**PROCESS NAME:** Cooling Water Tower

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 18000.00 gal/m

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0030 %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (A) Drift Eliminators with Draft Factor of 0.003%

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Drift Eliminators with Drift Factor of 0.003%

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (A) Drift Eliminators with Drift Factor of 0.003%

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Drift Eliminators with Drift Factor of 0.003%

#### Process/Pollutant Information

**PROCESS NAME:** Emergency Flare

**Process Type:** 19.310 (Chemical Plant Flares)

Natural Gas **Primary Fuel: Throughput:** 0.40 mmbtu/h **Process Notes:** Particulate matter, total  $< 10 \mu$  (TPM10) **POLLUTANT NAME: CAS Number:** PM Unspecified **Test Method: Pollutant Group(s):** (Particulate Matter (PM)) **Emission Limit 1: Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **Case-by-Case Basis: BACT-PSD** Other Applicable Requirements: NESHAP **Control Method:** (P) Proper design and operation Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) Proper design and operation

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) Proper design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) Proper design and operation

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) Proper design and operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Thermal Oxidizer with Caustic Scrubber

**Process Type:** 19.900 (Other Misc. Combustion)

**Primary Fuel:** 

**Throughput:** 33.50 mmbtu/h

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (B) Good combustion practices, Compliance with applicable NESHAP, and Caustic Scrubber.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (B) Good combustion practices, Compliance with applicable NESHAP, and Caustic Scrubber.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (B) Good combustion practices, Compliance with applicable NESHAP, and Caustic Scrubber.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (B) Good combustion practices, Compliance with applicable NESHAP, and Caustic Scrubber.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Fire Water Diesel Pump No. 3 Engine

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel Fuel
Throughput: 600.00 hp

**Process Notes:** Emergency engine with a limit of 100 hours/yr on operating hours for ready testing.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Proper operation and limits on hours operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Proper operation and limits on hours operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Proper operation and limits on hours operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (P) Proper operation and limits on hours operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) Proper operation and limits on hours operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Fire Water Diesel Pump No. 4 Engine

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel Fuel
Throughput: 600.00 hp

**Process Notes:** Emergency Engine limited to 100 hours/yr for ready tests

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

### **Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Standby Generator No. 9 Engine

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel Fuel
Throughput: 400.00 hp

**Process Notes:** Operating hours limited to 100 hours/yr for ready testing.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: **Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (P) Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60

Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Process Baghouse Dust Collector Filter

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 700.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0003 GR/DSCF

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0003 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 1 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Building Vent 2 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 3 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0020 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Building Vent 4 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Building Vent 5 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 6 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Building Vent 7 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Building Vent 8 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

#### **Process Notes:**

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10) **CAS Number:** PM Unspecified **Test Method: Pollutant Group(s):** ( Particulate Matter (PM) ) 0.0002 GR/DSCF **Emission Limit 1: Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **BACT-PSD Case-by-Case Basis:** Other Applicable Requirements: (A) Baghouse Dust Collector Filter **Control Method:** Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5) **POLLUTANT NAME: CAS Number:** PM **Test Method:** Unspecified **Pollutant Group(s):** ( Particulate Matter (PM) ) **Emission Limit 1:** 0.0002 GR/DSCF **Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Control Method:** (A) Baghouse Dust Collector Filter Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton

0 \$/ton

Unknown

**Pollutant/Compliance Notes:** 

**Compliance Verified:** 

**Incremental Cost Effectiveness:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 9 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Building Vent 10 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Building Vent 11 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 12 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**PROCESS NAME:** Building Vent 13 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 14 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq$  2.5  $\mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Building Vent 15 Baghouse Dust Collector

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 12000.00 cfm

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Baghouse Dust Collector Filter

Est. % Efficiency:

0 \$/ton **Cost Effectiveness:** 0\$/ton Incremental Cost Effectiveness: **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0002 GR/DSCF

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD** 

**Other Applicable Requirements:** 

**Control Method:** (A) Baghouse Dust Collector Filter

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

**RBLC ID:** LA-0317 (final) **Date Determination** 

Last Updated: 04/28/2017 **Permit Number:** PSD-LA-761(M4)

Corporate/Company METHANEX USA, LLC Name:

**Facility Name:** METHANEX - GEISMAR METHANOL PLANT

**Permit Date:** 12/22/2016 (actual)

2869

GLYNN FONTENOT 225-402-0301 GFONTENOT@METHANEX.COM **Facility Contact:** FRS Number: 110046528227

methanol plant (Unit I and Unit II) to produce 6000 metric tons of methanol by steam **Facility Description:** SIC Code:

reforming natural gas

**Permit Type:** A: New/Greenfield Facility **NAICS Code:** 325199 **Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: ASCENSION

Facility State: LA

Facility ZIP Code: 70734

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Other Agency Contact** 

permit writer: Dr. Qingming Zhang (225)-219-3457

Info:

Permit Notes: psd-la-761, issued 11/07/12, for relocation Unit I (3000 mt/yr) from punta arenas (chile); psd-la-761(M1), issued 07/12/13, for relocation

Unit II (3000 mt/yr); psd-la-761(M2) (issued 01/15/16), psd-la-761(M3) (issued 01/14/16), and psd-la-761(M4) (issued 12/22/16) are for

miscellaneous reconciliation

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 175.2200 (Tons/Year)
Nitrogen Oxides (NOx) 178.7000 (Tons/Year)
Particulate Matter (PM) 137.1900 (Tons/Year)
Sulfur Oxides (SOx) 10.5600 (Tons/Year)
Volatile Organic Compounds (VOC) 68.4000 (Tons/Year)

### Process/Pollutant Information

**PROCESS NAME:** Steam methane reformers (I-H-101, II-H-101)

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: natural gas

**Throughput:** 2364.00 mm btu/hr

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Cond. Test Mthd 022

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0070 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Other Applicable Requirements:** 

Control Method: (A) SCR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT = LAER (Permit 0180-00210-V4, dated 12/22/2016)

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) proper burner design and operations

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Other Applicable Requirements:

Control Method: (P) pr

(P) proper burner design and operations

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) proper burner design and operations

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Other Applicable Requirements:** 

**Control Method:** (P) Energy efficiency measures with the installation of heat recovery steam generators

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: flares (I-X-703, II-X-703)

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

**Throughput:** 3723.00 mm btu/hr

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) complying with 40 CFR 63.11

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT = LAER (Permit 0180-00210-V4, dated 12/22/2016)

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63.11

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63.11

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63.11

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63.11

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**PROCESS NAME:** Emergency Generator Engines (4 units)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** Diesel

**Throughput:** 0

**Process Notes:** I-GDE-1201, II-GDE-1201 = 2346 hp I-GDE-1202 = 755 hp I-GDE-1203 = 1193 hp

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT = LAER (Permit 0180-00210-V4, dated 12/22/2016)

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Firewater pump Engines (4 units)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** diesel

**Throughput:** 896.00 hp (each)

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{NESHAP}$ 

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{NESHAP}$ 

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT = LAER (Permit 0180-00210-V4, dated 12/22/2016)

### Process/Pollutant Information

**PROCESS NAME:** Compressor Vents (I-C-601, II-C-601)

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

**Throughput:** 11820.00 kg/hr

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) proper equipment design, good operating and maintenance practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) energy efficiency measures

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** cooling towers (I-CT-621, II-CT-621)

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 66000.00 gpm (each)

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0010 % DRIFT RATE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Drift eliminators

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0010 % DIRFT RATE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) drift eliminators

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** 

**Process Type:** 22.200 (Industrial Wastewater Treatment)

**Primary Fuel:** 

**Throughput:** 750000.00 gallons/day

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Energy efficiency measures

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Process Fugitives (I-G-1000, II-G-1000)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput:

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1: Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD** Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 Subpart H

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

**RBLC ID:** LA-0314 (final) **Date Determination** 

> Last Updated: 04/28/2017

> > 110000748040

FRS Number:

Corporate/Company Name: INDORAMA VENTURES OLEFINS, LLC **Permit Number:** PSD-LA-813

**Facility Name:** 08/03/2016 (actual) INDORAMA LAKE CHARLES FACILITY **Permit Date:** 

**Facility Contact:** WEDEMEYER 337-476-7451 SUSAN.WEDEMEYER@US.INDORAMA.NET

**Facility Description:** modify and restart-up a mothballed facility to produce 1,009 million lbs/yr of ethylene **SIC Code:** 2869

**Permit Type:** C: Modify process at existing facility **NAICS Code:** 325199

**Permit URL:** 

**EPA Region:** 6 **COUNTRY:** USA

**Facility County: CALCASIEU** 

**Facility State:** LA **Facility ZIP Code:** 70669

**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Permit Writer: Dan Nguyen (225)219-3395 Other Agency Contact Info:

**SUSAN** 

**Permit Notes:** 

**Affected Boundaries: Boundary Type:** Class 1 Area State: **Boundary:** Distance: CLASS1 > 250 kmLA Breton

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 432.0000 (Tons/Year)
Nitrogen Oxides (NOx) 303.0000 (Tons/Year)
Particulate Matter (PM) 60.0000 (Tons/Year)
Sulfur Oxides (SOx) 20.0000 (Tons/Year)
Volatile Organic Compounds (VOC) 189.0000 (Tons/Year)

### Process/Pollutant Information

**PROCESS NAME:** Modular Ethylene Cracking Furnaces - 001

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

Primary Fuel: natural gas/fuel gas
Throughput: 1028.00 MM BTU/hr

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices; fueled by natural gas or process fuel gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices; fueled by natural gas or process fuel gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0100 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) good combustion practices; fueled by natural gas or process fuel gas; LNB + SCR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0400 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0054 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance; gaseous fuels; economizers & Insulation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Ethylene Cracking Furnace - 015

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

Primary Fuel: natural gas/fuel gas

**Throughput:** 168.00 mm btu

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices, fueled by natural gas and/or fuel gas

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices, fueled by natural gas and/or fuel gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0980 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) LNB, good combustion practices, fueled by natural gas and/or fuel gas

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0400 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0054 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices and proper operation and maintenance; gaseous fuels; economizers & insulation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Dryer Regenerator Heater - 005

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: process fuel gas
Throughput: 29.00 mm btu/hr

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0820 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1:
Emission Limit 2:
Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance; gaseous fuels; Insulation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices; fueled by process fuel gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices; fueled by process fuel gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0600 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices; ULNB

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** boiler A and B (010 and 011)

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: natural gas/fuel gas

**Throughput:** 248.00 mm btu/hr (each)

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good combustion practices; fueled by natural gas or process fuel gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) good combustion practices; fueled by natural gas or process fuel gas

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0600 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices; fueled by natural gas or process fuel gas; ULNB (FGR and economizer)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0820 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance; gaseous fuels; economizers & Insulation;

combustion air preheating; condensate return system

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** boiler B-201

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: natural gas/fuel gas

**Throughput:** 229.00 mm btu

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices; fueled by natural gas or process fuel gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices; fueled by natural gas or process fuel gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0600 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices; fueled by natural gas or process fuel gas; ULNB (FGR and economizer)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0370 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): ( Greenhouse Gasses (GHG) )

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices and proper operation and maintenance; gaseous fuels; economizers & Insulation;

combustion air preheating; condensate return system

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: Flare No. 1 - 008

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

**Throughput:** 85097.00 MM BTU/yr

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) ) **Emission Limit 1:** 0.0070 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (P) complying with 40 CFR 60.18; good combustion practices (including establishment of flare minimization

practices); steam assisted

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0070 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

**Control Method:** (P) complying with 40 CFR 60.18; good combustion practices (including establishment of flare minimization

practices); steam assisted

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) complying with 40 CFR 60.18; good combustion practices (including establishment of flare minimization

practices)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.3100 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) complying with 40 CFR 60.18; good combustion practices (including establishment of flare minimization

practices)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 98.0000 % REMOVAL EFFICIENCY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (P) complying with 40 CFR 60.18; good combustion practices (including establishment of flare minimization

practices)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good management practices, good combustion practices, proper flare design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Pyrolysis Gasoline Tank Flare - 009

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

**Throughput:** 0.66 mm btu/hr

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0070 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60.18 and 63.11; good combustion practices (including establishment of flare

minimization practices); steam assisted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) ) **Emission Limit 1:** 0.0070 LBS/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60.18 and 63.11; good combustion practices (including establishment of flare

minimization practices); steam assisted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, NSPS

Control Method: (P) complying with 40 CFR 60.18 and 63.11; good combustion practices (including establishment of flare

minimization practices)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.3100 LB/MM BTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NESHAP

Control Method: (P) complying with 40 CFR 60.18 and 63.11; good combustion practices (including establishment of flare

minimization practices)

Est. % Efficiency:

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 98.0000 % REMOVAL EFFICIENCY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, NESHAP

**Control Method:** (P) complying with 40 CFR 60.18 and 63.11; good combustion practices (including establishment of flare

minimization practices)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good management practices, good combustion practices, proper flare design

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

**PROCESS NAME:** vessel evacuation flare - 018

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

**Throughput:** 3.04 mm btu/hr

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices (including establishment of flare minimization practices)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0070 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices (including establishment of flare minimization practices)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good combustion practices (including establishment of flare minimization practices)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3100 LBS/MM BTU THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices (including establishment of flare minimization practices)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 98.0000 % REMOVAL EFFICIENCY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good combustion practices (including establishment of flare minimization practices)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: **Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Insulation, Gaseous fuels, good combustion practices, and proper operation and maintenance

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Diesel Firewater pump engines (6 units)

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: diesel

**Throughput:** 425.00 hp

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Diesel emergency generator engine - EGEN

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: diesel

**Throughput:** 350.00 hp

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) complying with 40 CFR 63 subpart ZZZZ

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** cooling towers - 007

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 86500.00 gpm

#### **Process Notes:**

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10) **CAS Number:** PM Unspecified **Test Method: Pollutant Group(s):** ( Particulate Matter (PM) ) 0.0005 % DRIFT RATE **Emission Limit 1: Emission Limit 2:** 1400.0000 PPM TDS **Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **BACT-PSD Case-by-Case Basis:** Other Applicable Requirements: (P) drift eliminators **Control Method:** Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5) **POLLUTANT NAME: CAS Number:** PM **Test Method:** Unspecified **Pollutant Group(s):** (Particulate Matter (PM)) **Emission Limit 1:** 0.0005 % DRIFT RATE **Emission Limit 2:** 1400.0000 PPM TDS **Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Control Method:** (P) drift eliminators Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton

0 \$/ton

Unknown

**Pollutant/Compliance Notes:** 

**Compliance Verified:** 

**Incremental Cost Effectiveness:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

**Control Method:** (P) monitored as required by 40 CFR 63 subpart XX

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** oil tank FA-712 - 012

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 66150.00 gal

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Other Applicable Requirements:** 

**Control Method:** (P) IFR with liquid mounted seal, double seal, or mechanical seal

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** storm water surge tank TK-9 - 013

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 291410.00 gallons

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) fixed roof

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### Process/Pollutant Information

**PROCESS NAME:** process water storage tanks TK-301A/B - 017

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 350000.00 gallons

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) EFR with primary and secondary seal, submerged fill pipe, and complying with 40 CFR 63 Subpart WW

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Unleaded Gasoline Tank TK-33

**Process Type:** 42.005 (Petroleum Liquid Storage in Fixed Roof Tanks)

**Primary Fuel:** 

**Throughput:** 1000.00 gallons

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Submerged fill pipe and LAC 33:III.2103

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Methanol Tank TK-2

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 1469.00 gallons

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Control Method: (P) Submerged fill pipe and LAC 33:III.2103

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** pyrolysis gasoline tank V-410

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 946996.00 gallons

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (A) Closed vent system and routed to a flare, Complying with 40 CFR 60 Subpart Kb and LAC 33:III.2103

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** wastewater treatment system

**Process Type:** 22.200 (Industrial Wastewater Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) Complying with 40 CFR 63 Subpart XX

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Fugitive Emissions

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** NESHAP

Control Method: (P) proper piping design, complying with LAC 33:III.2111, and conduct an LDAR meeting requirements of 40

CFR 63 Subpart UU

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: LA-0295 (final) Date Determination

Corporate/Company Name: EQUISTAR CHEMICALS, LP Permit Number: PSD-LA-806

Facility Name: WESTLAKE FACILITY Permit Date: 07/12/2016 (actual)

Last Updated:

09/19/2016

Facility Contact: JOSEPH BUSH (337) 882-1615 JOE.BUSH@LYONDELLBASELL.COM FRS Number: 110000597266

**Facility Description:** Polypropylene manufacturing facility SIC Code: 2821

Permit Type: D: Both B (Add new process to existing facility) &C (Modify process at existing NAICS Code: 325211

facility)

EDA D. ...

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: CALCASIEU

Facility State: LA Facility ZIP Code: 70669

**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Permit writer: Anthony Randall, (225) 219-3417 or anthony.randall@la.gov

**Permit Notes:** Complete application date = date of administrative completeness Permit is for a retroactive PSD review.

#### Process/Pollutant Information

**PROCESS NAME:** CGP Unit Cooling Tower (3-03, EQT 15)

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 3000.00 GPM

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1300 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Monthly hydrocarbon monitoring; maintain equipment to minimize fugitive emissions; repair faulty

equipment at the earliest opportunity, but no later than the next scheduled unit shutdown

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Annual VOC emissions from the CGP Unit Cooling Tower, along with VOC emissions from a number of other

cooling towers not addressed in the PSD permit, are capped at 12.29 TPY (GRP 13).

### Process/Pollutant Information

**PROCESS NAME:** M-Line Production Area Flare (FL061) (Z2, EQT 19)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Flare is subject to 40 CFR 60.18 and Subpart DDD.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 8882.9200 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT Control Method: (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Annual VOC emissions from the Cogeneration Plant Flare (449, EQT 326); the M-Line Production Area Flare

(Z2, EQT 19); and the Plant 5 Flare (Z1, EQT 138) (not addressed in the PSD permit) are limited to 465.93 TPY

(GRP 12).

#### Process/Pollutant Information

**PROCESS NAME:** Reciprocating Internal Combustion Engines 1 and 2 (1-08, EQT 321 & 2-08, EQT 322)

**Process Type:** 17.150 (Other Gaseous)

Primary Fuel: NATURAL GAS AND VENT GAS

**Throughput:** 11265.00 HP

**Process Notes:** Engines are subject to 40 CFR 60 Subparts DDD and JJJJ.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 14.6700 LB/H HOURLY MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Good combustion practices, including good equipment design, use of gaseous fuels for good mixing, and

proper combustion techniques (see notes below)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Aggregate NOx emissions from the engines are capped at 103.90 TPY (GRP 10). Good combustion practices

shall include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines

or within a range that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 3.3500 LB/H HOURLY MAXIMUM

Emission Limit 2: 29.0000 PPMVD @ 5% O2 ANNUAL AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (B) Oxidation catalyst and good combustion practices, including good equipment design, use of gaseous fuels

for good mixing, and proper combustion techniques (see notes below)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Aggregate VOC emissions from the engines are capped at 23.69 TPY (GRP 10). Good combustion practices

shall include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines

or within a range that is otherwise indicative of proper operation of the emissions unit.

#### Process/Pollutant Information

**PROCESS NAME:** Solar Titan 130 Gas Turbine with Unfired HRSG (3-08, EQT 323)

**Process Type:** 16.210 (Natural Gas (includes propane & liquified petroleum gas))

**Primary Fuel:** Natural Gas

**Throughput:** 159.46 MM BTU/HR

**Process Notes:** Turbine is subject to 40 CFR 60 Subpart KKKK. Output power at generator: 14.117 MW

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 14.2500 LB/HR HOURLY MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 15.0000 PPMVD @ 15% O2 ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Dry low NOx combustor (SoLoNOx) and good combustion practices, including good equipment design, use

of gaseous fuels for good mixing, and proper combustion techniques (see notes below)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.6400 LB/H HOURLY MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 2.5000 PPMVD @ 15% O2 ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices, including good equipment design, use of gaseous fuels for good mixing, and

proper combustion techniques consistent with the manufacturer's recommendations to maximize fuel efficiency

and minimize emissions (see notes below)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the emissions unit. PSD permit requires an annual stack test for VOC. If VOC < 75% of the permit limit, the frequency of the testing may be reduced to once every 2 years. If result of any subsequent test exceeds 75% of

the permit limit, resume annual testing.

#### Process/Pollutant Information

**PROCESS NAME:** Firetube Boiler Nos. 1 and 2 (4-08, EQT 324 & 5-08, EQT 325)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** NATURAL GAS AND VENT GAS

**Throughput:** 63.00 MM BTU/H

**Process Notes:** Boilers are subject to 40 CFR 60 Subpart Dc. Boiler No. 1 is also subject to 40 CFR 60 Subpart DDD.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.7500 LB/H HOURLY MAXIMUM

Emission Limit 2: 30.0000 PPMVD @ 3% O2 ANNUAL AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) Flue gas recirculation and good combustion practices, including good equipment design, use of gaseous

fuels for good mixing, and proper combustion techniques (see notes below)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Aggregate NOx emissions from the boilers are capped at 10.05 TPY (GRP 11). Good combustion practices shall

include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas

temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the emissions unit. The PSD permit also

references the 30 ppmvd @ 3% O2 limit as a "three 1-hour testing average."

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.2100 LB/H HOURLY MAXIMUM

Emission Limit 2: 2.8000 PPMVD @ 3% O2 ANNUAL AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) Oxidation catalyst and good combustion practices, including good equipment design, use of gaseous fuels

for good mixing, and proper combustion techniques (see notes below)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Aggregate VOC emissions from the boilers are capped at 0.90 TPY (GRP 11). Good combustion practices shall

include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas

temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the emissions unit. The PSD permit also

references the 2.8 ppmvd @ 3% O2 limit as a "three 1-hour testing average."

### Process/Pollutant Information

**PROCESS NAME:** Cogeneration Plant Flare (449, EQT 326)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** Flare is subject to 40 CFR 60.18 and Subpart DDD.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 165.7500 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT Control Method: (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Annual VOC emissions from the Cogeneration Plant Flare (449, EQT 326); the M-Line Production Area Flare

(Z2, EQT 19); and the Plant 5 Flare (Z1, EQT 138) (not addressed in the PSD permit) are limited to 465.93 TPY

(GRP 12).

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 12.6000 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Annual NOx emissions from the Cogeneration Plant Flare (449, EQT 326); the M-Line Production Area Flare

(Z2, EQT 19); and the Plant 5 Flare (Z1, EQT 138) (not addressed in the PSD permit) are limited to 36.65 TPY

(GRP 12).

#### Process/Pollutant Information

**PROCESS NAME:** Bulk Storage Vents (RLP 5, 9, 10, & 11)

**Process Type:** 69.999 (Other Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 1200.00 ACFM

**Process Notes:** Vents are subject to 40 CFR 60 Subpart DDD.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0100 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Good design and operating practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Annual VOC emissions from these vents, along with VOC emissions from a number of other vents not

addressed in the PSD permit, are capped at 6.91 TPY (GRP 15).

#### Process/Pollutant Information

**PROCESS NAME:** Facility Fugitive Emissions (FUG 4)

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, NSPS

Control Method: (P) Leak detection and repair (LDAR): LAC 33:III.2122

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 40 CFR 60 Subpart DDD (referencing Subpart VV) is also applicable, but LAC 33:III.2122 is the overall most

stringent program.

# Facility Information

RBLC ID: LA-0305 (final) Date Determination

**Last Updated:** 04/28/2017

Corporate/Company Name: LAKE CHARLES METHANOL, LLC
Permit Number: PSD-LA-803(M1)

Facility Name: LAKE CHARLES METHANOL FACILITY
Permit Date: 06/30/2016 (actual)

Facility Contact: JOHN MCDANIEL 318-308-0322 JMCDANIEL@LAKECHARLESMETHANOL.COM FRS Number: 110067180366

**Facility Description:** Proposed facility to produce methanol, H2, H2SO4, CO2, Argon and electricity from Pet

Coke

**Permit Type:** A: New/Greenfield Facility

**NAICS Code:** 

**SIC Code:** 

325199

2869

**Permit URL:** 

**EPA Region:** 6

**COUNTRY:** 

USA

Facility County: CALCASIEU PARISH

Facility State: LA

Facility ZIP Code: 70669

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Dan Nguyen - (225)219-3395

Permit Notes: PSD-LA-803 was issued 2/24/2016. The facility has not commence construction when Permit PSD-LA-803(M1) was issued.

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 461.2800 (Tons/Year)
Nitrogen Oxides (NOx) 168.4900 (Tons/Year)
Particulate Matter (PM) 70.3500 (Tons/Year)
Sulfur Oxides (SOx) 137.1000 (Tons/Year)
Volatile Organic Compounds (VOC) 18.4400 (Tons/Year)

### Process/Pollutant Information

**PROCESS NAME:** Auxiliary Boilers and Superheaters

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

**Throughput:** 0

**Process Notes:** Supplement fuel: fuel gas Boilers: 225 MM BTU/hr each

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Other Applicable Requirements:** 

**Control Method:** (P) good equipment design and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good engineering design and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Other Applicable Requirements:** 

**Control Method:** (P) good engineering design and proper operation

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good engineering design and proper operation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

 $\begin{tabular}{ll} \textbf{Pollutant Group(s):} & (InOrganic Compounds , Oxides of Sulfur (SOx)) \\ \end{tabular}$ 

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

**Other Applicable Requirements:** 

Control Method: (P) fuel gases and/or pipeline quality natural gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0150 LBS/MM BTU 30 ROLLING AVG., EXCEPT SCR SU OR MAINT.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) SCR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

PROCESS NAME: Flares

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: Fuel Gas

**Throughput:** 1008.00 MM BTU/hr

**Process Notes:** 

POLLUTANT NAME: Carbon Dioxide Equivalent (CO2e)
CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good equipment design and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good flare design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good flare design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good flare design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### Process/Pollutant Information

**PROCESS NAME:** Acid Gas Removal Unit / CO2 Vent

**Process Type:** 69.999 (Other Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Thermal Oxidizers

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Thermal oxidizers

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS NAME: Wet Sulfuric Acid Plants

**Process Type:** 62.015 (Sulfuric Acid Plants)

**Primary Fuel:** 

**Throughput:** 904.30 tons/day (each)

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good equipment design and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good engineering design and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) SCR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 0.5000 LB/TON H2SO4 PROD.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) H2O2 scrubbers

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfuric Acid (mist, vapors, etc)

CAS Number: 7664-93-9
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Particulate Matter (PM))

**Emission Limit 1:** 0.1500 LBS/TON H2SO4 PROD.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Condenser, WESP, and H2O2 Scrubbers

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 LB/TON H2SO4 PROD.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Condenser, WESP, H2O2 scrubbers

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total < 2.5 μ (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 LB/TON H2SO4 PROD.

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Condenser, WESP, H2O2 scrubbers

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Regenerative Thermal Oxidizers

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** fuel gas

**Throughput:** 6.00 mm btu/hr (each)

**Process Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good equipment design and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Control Method:** (P) good engineering design and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Cooling Towers

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** Unit A = 241,843 gpm Unit B = 201,196 gpm Unit C = 72,531 gpm

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) Drift eliminators

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq$  2.5  $\mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Drift eliminators

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Coke Handling

**Process Type:** 99.190 (Other Fugitive Dust Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GR/DSCF THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) baghouses

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0050 GR/DSCF THREE ONE-HOUR TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) baghouses

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Sulfuric Acid Storage Tanks

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 68246.00 gallons

**Process Notes:** 

**POLLUTANT NAME:** Sulfuric Acid (mist, vapors, etc)

CAS Number: 7664-93-9
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Fixed roofs, submerged fill pipes, and nitrogen blanket

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Fugitives

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: Control Method: (N)

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Diesel Engines (Emergency)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel

**Throughput:** 4023.00 hp

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1:
Emission Limit 2:
Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Complying with 40 CFR 60 Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Complying with 40 CFR 60 Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1:
Emission Limit 2:
Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

**Control Method:** (P) Complying with 40 CFR 60 Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) Complying with 40 CFR 60 Subpart IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (P) Complying with 40 CFR 60 Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Complying with 40 CFR 60 Subpart IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Gasifier Start-up Preheat Burners

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural gas

**Throughput:** 23.00 MM BTU/hr (each)

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good engineering practices, good combustion technology, and use of clean fuels

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good engineering practices, good combustion technology, and use of clean fuels

Est. % Efficiency:

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good engineering practices, good combustion technology, and use of clean fuels

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good engineering practices, good combustion technology, and use of clean fuels

Est. % Efficiency:

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good engineering practices, good combustion technology, and use of clean fuels

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good equipment design and good combustion practices

Est. % Efficiency:

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** WSA Preheat Burners

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good engineering design and practices and use of clean fuels

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 

Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good engineering design and practices and use of clean fuels

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good engineering design and practices and use of clean fuels

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 

Emission Limit 2: Standard Emission:	
Did factors, other then air pollution technology considerations influence the BACT decisions: U	
Case-by-Case Basis:	BACT-PSD
Other Applicable Requirements:	
<b>Control Method:</b>	(P) good engineering design and practices and use of clean fuels
Est. % Efficiency:	
Cost Effectiveness:	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
<b>Pollutant/Compliance Notes:</b>	
POLLUTANT NAME:	Carbon Monoxide
CAS Number:	630-08-0
Test Method:	Unspecified
Pollutant Group(s):	(InOrganic Compounds)
<b>Emission Limit 1:</b>	
<b>Emission Limit 2:</b>	
Standard Emission:	
Did factors, other then air pollution technology considerations influence the BACT decisions: $\mathrm{U}$	
Case-by-Case Basis:	BACT-PSD
Other Applicable Requirements:	
<b>Control Method:</b>	(P) good engineering design and practices and use of clean fuels
Est. % Efficiency:	
<b>Cost Effectiveness:</b>	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
<b>Pollutant/Compliance Notes:</b>	
POLLUTANT NAME:	Carbon Dioxide Equivalent (CO2e)
CAS Number:	CO2e
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD** 

**Other Applicable Requirements:** 

**Control Method:** (P) good equipment design and good combustion practices

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

**RBLC ID:** LA-0275 (final) **Date** 

**Determination** 

**SIC Code:** 

04/28/2017

2865

Last Updated: Corporate/Company SASOL CHEMICALS (USA) LLC Permit Number: PSD-LA-291(M4)

Name:

**Facility Name:** LINEAR ALKYL BENZENE (LAB) UNIT **Permit Date:** 04/29/2016 (actual)

**Facility Contact:** ERIC RODRIGUEZ 281-588-3761 ERIC.RODRIGUEZ@SASOL.COM FRS Number: 110017418061

**Facility Description:** LAB production unit, PSD-LA-291(M2) issued October 18, 1998 - PSD-LA-291(M3) issued

November 29, 2010. Permit PSD-LA-291(M4) for emission limits revision, No BACT change.

**Permit Type:** C: Modify process at existing facility **NAICS Code:** 325110

**Permit URL:** 

**EPA Region:** 6 **COUNTRY:** USA

**Facility County: CALCASIEU** 

**Facility State:** LA **Facility ZIP Code:** 70669

**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Dan Nguyen, (225) 219-3395

Info:

**Permit Notes:** 

**Affected Boundaries: Boundary Type:** Class 1 Area State: **Boundary: Distance:**  CLASS1 LA Breton > 250 km

Facility-wide Pollutant Name: Facility-wide Emissions Increase:

Emissions: Nitrogen Oxides (NOx) 115.9800 (Tons/Year)
Particulate Matter (PM) 10.3300 (Tons/Year)

#### Process/Pollutant Information

**PROCESS** Heaters (3 units)

NAME:

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** Natural Gas and Ethane

**Throughput:** 0

Process Notes: LH-1(H-201): 87.3 MM BTU/hr - fires CH4 & Ethane LH-2(H-202): 21.0 MM BTU/hr - fires CH4 & Ethane LH-3(H-601): 220.5 MM BTU/hr -

fires CH4, Ethane, and hydrogen waste gas

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NESHAP

Control Method: (P) Low NOX burners

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** LH-1: 7.15 lbs/hr LH-2: 2.71 lbs/hr LH-3: 19.36 lbs/hr

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** LH-1: 0.86 lbs/hr LH-2: 0.21 lbs/hr LH-3: 1.67 lbs/hr

## Process/Pollutant Information

**PROCESS NAME:** LF-1 - LAB Unit Flare

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: Natural Gas

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 10.1500 LBS/HR HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Steam assisted

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.4000 LBS/HR HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) steam assisted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## **Facility Information**

RBLC ID: TX-0728 (final) Date Determination

Last Updated:

Corporate/Company Name: BASF Permit Number: 118239, N200

Facility Name: PEONY CHEMICAL MANUFACTURING FACILITY Permit Date: 04/01/2015 (actual)

05/16/2016

Facility Contact: DOUG REEVES (979) 415-8410 DOUG.REEVES@BASF.COM FRS Number: 110056953701

**Facility Description:** Ammonia production with hydrogen imported SIC Code: 2813

**Permit Type:** B: Add new process to existing facility **NAICS Code:** 325311

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: BRAZORIA

Facility State: TX

**Facility ZIP Code:** 

Permit Issued By: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Other Agency Contact Info: David Infortunio 512-239-1247

**Permit Notes:** 

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 LA Breton > 250 km

#### Process/Pollutant Information

**PROCESS** ammonia flare

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary** Natural gas, ammonia, hydrogen

**Fuel:** 

**Throughput:** 106396.00 MMBtu/yr

**Process** 4TPY ammonia throughput limit A flare is used to combust unreacted hydrogen, destroy impure hydrogen/ammonia streams, and to control process

**Notes:** shutdowns. The Flare is claimed to achieve 99% control for ammonia. Best Available Control Technology (BACT) for carbon monoxide (CO) from flares is good combustion practices. Sulfur Dioxide (SO2) emissions are controlled with the use of pipeline quality natural gas as fuel gas. The only

volatile organic compound (VOC) emitted from the flare result from using natural gas as fuel gas. As the flare is not used for control of VOC, assist gas is not needed to control emissions of particulate matter (PM). Emission rates provided are for worst case maintenance, start-up and shutdown (MSS)

scenarios.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 950.4100 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements:  $\ensuremath{\mathrm{N/A}}$ 

**Control Method:** (P) flare good combustion practices

Est. % Efficiency: 98.000

Cost Effectiveness: 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission rates provided are for worst-case MSS scenarios

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 223.4100 LB/H **Emission Limit 2:** 5.3900 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER
Other Applicable Requirements: N/A

**Control Method:** (P) no control

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The TPY emission rate is based on all operating scenarios. the lb/hr rate is based on worst case MSS scenarios.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 1.0200 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: N/A Control Method: (N)

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Emission rates provided are for worst-case MSS scenarios.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 9.3200 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: N/A
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** All VOC is from fuel gas not waste gas. Emission rates provided are for worst-case MSS scenarios.

## Process/Pollutant Information

**PROCESS** Emergency Diesel Generator

NAME:

**Process** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Type:

**Primary** Diesel

**Fuel:** 

**Throughput:** 1500.00 hp

Process

**Notes:** 

The emergency generator (EPN 17-1-4) at the site is diesel fired and rated at 1500 horsepower (hp). Lowest Achievable Emission Rates (LAER) for nitrogen oxides (NOx) is the use of a 40 Code Federal Rules (CFR) Part 89 Tier 2 engine and limited hours of operation. Emissions from the engine shall not exceed 0.0218 grams per horsepower-hour (g/hp-hr) of nitrogen oxides (NOx). The engine is limited to 52 hours per year of non-emergency operation. Emissions from the engine shall not exceed 0.01256 g/hp hr of carbon monoxide (CO). The fuel for the engine is limited to 15 parts per million sulfur by weight (ultra-low sulfur diesel). The engine is limited to 52 hours per year of non-emergency operation. Also applicable: 40CFR60 IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engine and 40CFR63 ZZZZ, National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.1500 LB/H

 Emission Limit 2:
 0.0100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Minimized hours of operations Tier II engine

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.1500 LB/H

 Emission Limit 2:
 0.0100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

Control Method: (P) Minimized hours of operations Tier II engine

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.1500 LB/H

 Emission Limit 2:
 0.0100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Minimized hours of operations Tier II engine

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0218 G/HP HR

**Emission Limit 2:** 0.3500 TPY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: LAER

Other Applicable Requirements: NSPS, MACT

Control Method: (P) Minimized hours of operations Tier II engine

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0126 G/HP HR **Emission Limit 2:** 0.2000 TPY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS, MACT

**Control Method:** (P) Minimized hours of operations Tier II engine

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

 Emission Limit 1:
 0.6100 LB/H

 Emission Limit 2:
 0.0200 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: N/A

**Control Method:** (P) Low sulfur fuel 15 ppmw

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

 Emission Limit 1:
 0.7000 LB/H

 Emission Limit 2:
 0.0200 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: N/A

**Control Method:** (P) Minimized hours of operations Tier II engine

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS** Diesel and lube oil tanks

NAME:

**Process Type:** 42.005 (Petroleum Liquid Storage in Fixed Roof Tanks)

**Primary Fuel:** 

**Throughput:** 10708.00 gallons/yr

Process Notes: The tanks are painted white. Loading is done via submerged piping. The volatile organic compound (VOC) vapor pressure of the diesel and lube oil

stored is below 0.0002 pounds per square inch actual (psia), so a fixed roof is reasonable.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

 Emission Limit 1:
 0.0200 LB/H

 Emission Limit 2:
 0.0100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

Other Applicable Requirements: NSPS

**Control Method:** (P) low vapor pressure fuel, submerged fill, white tank

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown
Pollutant/Compliance Notes: VP

## Process/Pollutant Information

**PROCESS** Cooling tower

NAME:

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 40000.00 gallons per minute

**Process Notes:** Total dissolved solids (TDS) shall not exceed 3,500 parts per million by weight. Volatile organic compounds (VOC) is not emitted from the cooling

tower as there is no VOC in the process.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.3500 LB/H

 Emission Limit 2:
 1.5300 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

Control Method: (A) drift eliminator is 0.0005% efficient

Est. % Efficiency: 0.001
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.3100 LB/H

 Emission Limit 2:
 1.0500 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

**Control Method:** (A) drift eliminator is 0.0005% efficient

Est. % Efficiency: 0.001
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.1200 LB/H

 Emission Limit 2:
 0.4100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

**Control Method:** (A) drift eliminator is 0.0005% efficient

Est. % Efficiency: 0.001
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS** Ammonia Start-Up Heater

NAME:

**Process** 19.600 (Misc. Boilers, Furnaces, Heaters)

Type:

**Primary** pipeline quality natural gas

**Fuel:** 

**Throughput:** 8100.00 MMBtu/yr

**Process** Throughput also limited to 54MMBtu/hr. Given that the hours of operation are intermittent, it is unreasonable to use Selective Catalytic Reduction

Notes: (SCR) on this unit due to the time it takes SCR to reach a temperature at which it controls nitrogen oxides (NOx) emissions. The startup heater achieves 0.036 pounds per million british thermal units (lb/MMBtu) for NOx. This rate is supported by the RACT/BACT/LAER Clearinghouse (RBLC) database,

as well as recently issued permits in Texas and other states. California regulations require 0.011 lb. NOx/MMBtu as reasonably available control technology (RACT) (Southern California Air Quality District (SCAQMD) Rule 1146) but this is not achievable for intermittent emissions resulting from

heaters being used exclusively in support of maintenance, start-up, and shutdown (MSS) activities.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 1.9600 LB/H

**Emission Limit 2:** 50.0000 PPMVD @ 3% O2

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

**Control Method:** (P) limited hours of operation

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 1.9100 LB/H

**Emission Limit 2:** 0.0360 LB/MMBTU

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

Control Method: (P) limited hours of operation and low NOx burners

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

 Emission Limit 1:
 0.4000 LB/H

 Emission Limit 2:
 0.0300 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

**Control Method:** (P) use of gaseous fuel

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

 Emission Limit 1:
 0.0300 LB/H

 Emission Limit 2:
 0.0100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

Control Method: (P) limited hours of operation and low sulfur fuel

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

 Emission Limit 1:
 0.2700 LB/H

 Emission Limit 2:
 0.0200 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: OTHER CASE-BY-CASE

**Other Applicable Requirements:** 

**Control Method:** (P) use of gaseous fuel

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton Unknown **Compliance Verified:** 

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Lead (Pb) / Lead Compounds

7439-92-1 **CAS Number:** Unspecified **Test Method:** 

(Hazardous Air Pollutants (HAP), Heavy Metals, InOrganic Compounds, Particulate Matter (PM)) **Pollutant Group(s):** 

**Emission Limit 1:** 0.0100 LB/H **Emission Limit 2:** 0.0100 T/YR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

OTHER CASE-BY-CASE **Case-by-Case Basis:** 

Other Applicable Requirements: MACT

**Control Method:** (P) limited hours of operation

Est. % Efficiency:

0 \$/ton **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness: Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 40CFR63 Subpart DDDDD, National Emission Standards For Hazardous Air Pollutants For Major Sources:

Industrial, Commercial, And Institutional Boilers And Process Heaters.

## **Facility Information**

**RBLC ID: Date Determination** AK-0082 (final)

Last Updated: 02/19/2016 **Permit Number: Corporate/Company Name:** EXXON MOBIL CORPORATION AQ1201CPT03

**Facility Name:** POINT THOMSON PRODUCTION FACILITY **Permit Date:** 01/23/2015 (actual)

FRS Number:

**Facility Contact:** MATT REILE 907 929 4108 MATTHEW.R.REILE@EXXONMOBIL.COM 110058932561

OIL GAS EXPLORATION AND PRODUCTION FACILITY. SIC Code: **Facility Description:** 1382 **NAICS Code: Permit Type:** C: Modify process at existing facility 211111

http://dec.alaska.gov/Applications/Air/airtoolsweb/Home/ViewAttachment/16685549/QXjhK6BJvK3h8EByjhru7Q2 **Permit URL:** 

**COUNTRY:** USA **EPA Region:** 10

Facility County: USA
Facility State: AK

**Facility ZIP Code:** 

Permit Issued By: ALASKA DEPT OF ENVIRONMENTAL CONS (Agency Name)

MR. JIM PLOSAY(Agency Contact) (907) 465-5103 JOHN.KUTERBACH@ALASKA.GOV

**Permit Notes:** Revise Existing RBLC ID AK-0076 to include pollutants: PM-10 and VOC which now trigger PSD.

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

INTL BORDER US/Canada Border < 100 km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 122.0000 (Tons/Year)
Nitrogen Oxides (NOx) 294.3000 (Tons/Year)
Particulate Matter (PM) 25.9000 (Tons/Year)
Sulfur Oxides (SOx) 32.1000 (Tons/Year)
Volatile Organic Compounds (VOC) 43.3000 (Tons/Year)

### Process/Pollutant Information

**PROCESS** Turbines

NAME:

**Process Type:** 16.150 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** Fuel Gas **Throughput:** 7520.00 kW

**Process Notes:** Four 7.52 MW Solar Turbines with SoLoNOx Technology burning natural gas on the North Slope of Alaska, north of the Artic Circle. Two of the

turbines are dual fired units that can combust ULSD as well as Fuel Gas

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 15.0000 PPMV 15% OXYGEN

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (B) Dry Low NOx and SoLoNOx. DLN combustors utilize multistage premix combustors where the air and fuel

is mixed at a lean fuel to air ratio. The excess air in the lean mixture acts as a heat sink, which lowers peak combustion temperatures and also ensures a more homogeneous mixture, both resulting in greatly reduced NOX formation rates. SoLoNOx is a lean premixed process which improves combustion efficiency and reduce NOx

and particulate emissions.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 2.5000 PPMV 15% OXYGEN

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) SCR (Selective Catalytic Reduction) is a post-combustion gas treatment technique for reduction of nitric

oxide (NO) and nitrogen dioxide (NO2) in the turbine exhaust stream to molecular nitrogen, water, and oxygen. This process is accomplished by using ammonia (NH3) as a reducing agent, and is injected into the flue gas upstream of the catalyst bed. By lowering the activation energy of the NOX decomposition removal efficiency of

80 to 90 percent are achievable.

Est. % Efficiency:85.000Cost Effectiveness:1400 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable < 2.5 μ (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0660 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0066 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 2.5000 PPMV

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 89336.0000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Airstrip Generator Engine

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 490.00 hp

**Process Notes:** One 490 hp Airstrip Generator Engine

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0025 LB/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.8000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 2.6000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.1500 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5) **POLLUTANT NAME:** 

**CAS Number:** PM

Unspecified **Test Method:** 

( Particulate Matter (PM) ) **Pollutant Group(s): Emission Limit 1:** 0.1500 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD** 

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

**CAS Number:** CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 163.0000 TONS/YEAR

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD** 

**Other Applicable Requirements:** 

(N) **Control Method:** 

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Fine Water Pumps

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 610.00 hp

**Process Notes:** Two ULSD-fired 610 hp Fine Water Pumps

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 3.0000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 2.6000 GRAMS/HP-H

<b>Emission Limit 2:</b>		
<b>Standard Emission:</b>		
Did factors, other then air pollution technology considerations influence the BACT decisions: $\mathrm{U}$		
Case-by-Case Basis:	BACT-PSD	
Other Applicable Requirements:		
<b>Control Method:</b>	(N)	
Est. % Efficiency:		
<b>Cost Effectiveness:</b>	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
<b>Pollutant/Compliance Notes:</b>		
POLLUTANT NAME:	Particulate matter, filterable $<$ 10 $\mu$ (FPM10)	
CAS Number:	PM	
<b>Test Method:</b>	Unspecified	
Pollutant Group(s):	( Particulate Matter (PM) )	
<b>Emission Limit 1:</b>	0.1500 GRAMS/HP-H	
<b>Emission Limit 2:</b>		
Standard Emission:		
Did factors, other then air pollution technology considerations influence the BACT decisions: U		
Case-by-Case Basis:	BACT-PSD	
<b>Other Applicable Requirements:</b>		
Control Method:	(N)	
Est. % Efficiency:		
<b>Cost Effectiveness:</b>	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
<b>Pollutant/Compliance Notes:</b>		
POLLUTANT NAME:	Particulate matter, filterable $< 2.5 \mu$ (FPM2.5)	
CAS Number:	PM	
Test Method:	Unspecified	
Pollutant Group(s):	( Particulate Matter (PM) )	
<b>Emission Limit 1:</b>	0.1500 GRAMS/HP-H	

E I		
Emission Limit 2:		
Standard Emission:	Control of the CT desired and th	
•	ion technology considerations influence the BACT decisions: U	
Case-by-Case Basis:	BACT-PSD	
Other Applicable Requirements:		
Control Method:	(N)	
Est. % Efficiency:		
Cost Effectiveness:	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
<b>Pollutant/Compliance Notes:</b>		
POLLUTANT NAME:	Volatile Organic Compounds (VOC)	
CAS Number:	VOC	
<b>Test Method:</b>	Unspecified	
Pollutant Group(s):	(Volatile Organic Compounds (VOC))	
<b>Emission Limit 1:</b>	0.0007 LB/HP-H	
<b>Emission Limit 2:</b>		
Standard Emission:		
Did factors, other then air pollution technology considerations influence the BACT decisions: U		
Case-by-Case Basis:	BACT-PSD	
Other Applicable Requirements:		
<b>Control Method:</b>	(N)	
Est. % Efficiency:		
<b>Cost Effectiveness:</b>	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
<b>Pollutant/Compliance Notes:</b>		
POLLUTANT NAME:	Carbon Dioxide Equivalent (CO2e)	
CAS Number:	CO2e	
Test Method:	Unspecified	
Pollutant Group(s):	( Greenhouse Gasses (GHG) )	

**Emission Limit 1:** 565.0000 TONS/YEAR COMBINED

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Bulk Tank Generator Engines

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 891.00 hp

Process Notes: Two ULSD-fired 891 hp Bulk Tank Storage Area Generator Engines

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.8000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified:	Unknown
Pollutant/Compliance Notes:	
POLLUTANT NAME:	Carbon Monoxide
CAS Number:	630-08-0
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	(InOrganic Compounds)
<b>Emission Limit 1:</b>	2.6000 GRAMS/HP-H
<b>Emission Limit 2:</b>	
<b>Standard Emission:</b>	
Did factors, other then air pollut	ion technology considerations influence the BACT decisions: $\mathrm{U}$
Case-by-Case Basis:	BACT-PSD
<b>Other Applicable Requirements:</b>	
<b>Control Method:</b>	(N)
Est. % Efficiency:	
<b>Cost Effectiveness:</b>	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
Pollutant/Compliance Notes:	
POLLUTANT NAME:	Particulate matter, filterable $< 10 \mu (FPM10)$
CAS Number:	PM
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	( Particulate Matter (PM) )
<b>Emission Limit 1:</b>	0.1500 GRAMS/HP-H
<b>Emission Limit 2:</b>	
<b>Standard Emission:</b>	
Did factors, other then air pollut	ion technology considerations influence the BACT decisions: U
Case-by-Case Basis:	BACT-PSD
Other Applicable Requirements:	
Control Method:	(N)
Est. % Efficiency:	
CL (Tee (	0.01

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.1500 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0007 LB/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 7194.0000 TONS/YEAR COMBINED

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Agitator Generator Engine

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 98.00 hp

**Process Notes:** ULSD-fired 98 hp Agitator Generator Engine

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 3.7000 GRAMS/HP-H

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 5.6000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.3000 GRAMS/HP-H

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.3000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0025 LB/HP-H

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))

Emission Limit 1: 356.0000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Incinerator Generator Engine

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 102.00 hp

**Process Notes:** ULSD-fired 102 hp Incinerator Generator Engine

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 3.7000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Dioxide (NO2)

CAS Number: 10102-44-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx))

**Emission Limit 1:** 4.9000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.2200 GRAMS/HP-H

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.2200 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### **Pollutant/Compliance Notes:**

POLLUTANT NAME: Volatile Organic Compounds (VOC)
CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0025 LB/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 516.0000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

#### **Pollutant/Compliance Notes:**

### Process/Pollutant Information

**PROCESS NAME:** Boilers and Heaters

**Process Type:** 13.220 (Distillate Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 7.00 MMBTU/H

**Process Notes:** 33 ULSD-fired Boilers and Heaters ranging from 1 to 7 MMBtu/hr

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 20.0000 LB/1,000 GAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 5.0000 LB/1,000 GAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 2.3000 LB/1,000 GAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 1.5500 LB/1,000 GAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.2520 LB/1,000 GAL

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 45537.0000 TONS/YEAR COMBINED

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Waste Incinerator

**Process Type:** 21.400 (Municipal Waste Combustion)

**Primary Fuel:** Gas, ULSD, or Trash

**Throughput:** 4.90 MMBTU/H

Process Notes: 4.9 MMBtu Gas-, ULSD-, or Trash-fired new, small, remote Waste Incinerator capable of firing 220 lbs/hr

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 170.0000 PPMV

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 13.0000 PPMV

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 270.0000 MG/DSCM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 270.0000 MG/DSCM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.0000 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 981.0000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Remote Incinerator Generator Engine

**Process Type:** 21.400 (Municipal Waste Combustion)

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 102.00 hp

**Process Notes:** 102 hp ULSD-fired existing, small, remote Waste Incinerator

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 3.0000 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Control Method:** (N) Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes: POLLUTANT NAME:** Carbon Monoxide **CAS Number:** 630-08-0 Unspecified **Test Method: Pollutant Group(s):** (InOrganic Compounds) **Emission Limit 1:** 10.0000 LB/TON **Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **Case-by-Case Basis: BACT-PSD Other Applicable Requirements:** (N) **Control Method:** Est. % Efficiency: 0 \$/ton **Cost Effectiveness: Incremental Cost Effectiveness:** 0 \$/ton Unknown **Compliance Verified: Pollutant/Compliance Notes: POLLUTANT NAME:** Particulate matter, filterable < 10 µ (FPM10) PM **CAS Number:** 

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.0000 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.0000 LB/TON

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.0000 LB/TON

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 892.0000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Drilling, HP, and LP Flares

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** Gas

**Throughput:** 50.00 MMscf/yr

**Process Notes:** 50 MMscf/yr Drilling Flare, 35 MMscf/yr HP Flare-Pilot/Purge, 20 MMscf/yr LP Flare-Pilot/Purge

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.3700 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0264 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

**CAS Number:** PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0264 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.1400 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 5317.0000 TONS/YEAR COMBINED

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### Process/Pollutant Information

**PROCESS NAME:** Emergency Camp Generators

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Ultra Low Sulfur Diesel

**Throughput:** 2695.00 hp

**Process Notes:** Three 2,695 hp ULSD-fired Standby Camp Generator Engines.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.8000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 2.6000 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** (N) **Control Method:** Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes: POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10) PM **CAS Number:** Unspecified **Test Method: Pollutant Group(s):** ( Particulate Matter (PM) ) **Emission Limit 1:** 0.1500 GRAMS/HP-H **Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: U **BACT-PSD Case-by-Case Basis: Other Applicable Requirements: Control Method:** (N) Est. % Efficiency: 0 \$/ton **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness: Compliance Verified:** Unknown **Pollutant/Compliance Notes: POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5) **CAS Number:** PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.1500 GRAMS/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0007 LB/HP-H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 2332.0000 TONS/YEAR COMBINED

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

Corporate/Company AGRIUM U.S. INC.

RBLC ID: AK-0083 (final)

**Determination** 

SIC Code:

**Last Updated:** 02/19/2016

Permit AQ0083CPT06

Name: Number:

Facility Name: KENAI NITROGEN OPERATIONS Permit Date: 01/06/2015

(actual)

2873

Facility Contact: TED HARTMAN 913 302 7469 TED.HARTMAN@AGRIUM.COM FRS Number: 110030488620

**Facility Description:** The Kenai Nitrogen Operations Facility is located at Mile 21 of the Kenai Spur Highway, near Kenai Alaska. It

is classified as a nitrogenous fertilizer manufacturing facility under Standard Industrial Classification code 2873 and under North American Industrial Classification code 325311. The facility will produce ammonia and urea for bulk sale. There are two ammonia and two urea plants at Agrium's KNO facility. This permit authorizes the restart of one ammonia and one urea plant (plants 4 and 5). The ammonia plant converts natural gas with added steam and air to produce ammonia (NH3) and carbon dioxide (CO2). Feedstocks for the urea plant include CO2 and NH3. The utility plant generates the power and steam needed to operate the ammonia and urea plants. Final

products are loaded at the Product Loading Wharf for shipment.

Permit Type: A: New/Greenfield Facility NAICS Code: 325311

Permit URL: http://dec.alaska.gov/Applications/Air/airtoolsweb/Home/ViewAttachment/16672291/KQZafTqmYd8SVnZ3RUWQfQ2

EPA Region: 10 COUNTRY: USA

Facility County: USA
Facility State: AK
Facility ZIP Code: 99611

**Permit Issued By:** ALASKA DEPT OF ENVIRONMENTAL CONS (Agency Name)

MR. JIM PLOSAY(Agency Contact) (907) 465-5103 JOHN.KUTERBACH@ALASKA.GOV

**Permit Notes:** 

Affected Boundaries: Boundary Type: Class 1 Area State: Boundary: Distance:

CLASS1 AK Denali NP 100km - 50km

 $\begin{array}{cccc} CLASS1 & AK & Tuxedni & <100 \text{ km} \\ INTL BORDER & US/Canada Border & >250 \text{ km} \end{array}$ 

Facility-wide

Pollutant Name: Facility-wide Emissions Increase: 730.5000 (Tons/Year)

Emissions: Carbon Monoxide
Nitrogen Oxides (NOx)
Particulate Matter (PM)

Nitrogen Oxides (NOx)

Particulate Matter (PM)

Sulfur Oxides (SOx)

Volatile Organic Compounds (VOC)

214.1000 (Tons/Year)

174.8000 (Tons/Year)

8.9000 (Tons/Year)

114.2000 (Tons/Year)

### Process/Pollutant Information

**PROCESS NAME:** Five (5) Natural Gas Fired Combustion Turbines

**Process Type:** 16.110 (Natural Gas (includes propane & liquified petroleum gas))

**Primary Fuel:** Natural Gas

**Throughput:** 37.60 MMBTU/H

**Process Notes:** Five (5) Natural Gas-Fired Solar Combustion Turbines rated at 37.6 MMBtu/hr each. Installed in 1976.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 7.0000 PPMV 3-HR AVG @ 15 % O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Selective Catalytic Reduction

Est. % Efficiency: 80.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 50.0000 PPMV 3-HR AVG @ 15 % O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 10836 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The economic analysis indicates the level of CO reduction does not justify the use of catalytic oxidation. Based

on the excessive cost per ton of CO removed per year, installing catalytic oxidation on the turbines/waste heat

boilers is not considered a feasible option for reducing CO emissions.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0021 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 291788 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The economic analysis indicates the level of VOC reduction does not justify the use of catalytic oxidation.

Based on the excessive cost per ton of VOC removed per year, installing catalytic oxidation on the turbines is

not considered a feasible option for reducing VOC emissions.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 59.6100 TONS/MMCF 3-HR AVG

Emission Limit 2: 91500.0000 TONS/YEAR COMBINED

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

#### Process/Pollutant Information

**PROCESS NAME:** Primary Reformer Furnace

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas, Process Gas

**Throughput:** 1350.00 MMBTU/H

**Process Notes:** Natural Gas-, Process Gas-Fired 1,350 MMBtu/hr Primary Reformer Furnace. Installed in 1976.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 17.0000 PPMV 30-DAY AVERAGE @ 3% O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Selective Catalytic Reduction

Est. % Efficiency: 90.000

Cost Effectiveness: 15041 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: No

**Pollutant/Compliance Notes:** The economic analysis indicates the level of NOx reduction does not justify installing low NOx burners to be

used in conjunction with selective catalytic reduction. Based on the excessive cost per ton of NOx removed per year, installation of low NOx burners on the primary reformer is not considered a feasible option for reducing

NOx emissions.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0430 LB/MMBTU 3-HR AVG

<b>Emission Limit 2:</b>		
Standard Emission:		
Did factors, other then air pollution technology considerations influence the BACT decisions: U		
Case-by-Case Basis:	BACT-PSD	
Other Applicable Requirements:		
<b>Control Method:</b>	(N)	
Est. % Efficiency:		
<b>Cost Effectiveness:</b>	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
<b>Pollutant/Compliance Notes:</b>		
POLLUTANT NAME:	Volatile Organic Compounds (VOC)	
CAS Number:	VOC	
<b>Test Method:</b>	Unspecified	
Pollutant Group(s):	(Volatile Organic Compounds (VOC))	
<b>Emission Limit 1:</b>	0.0054 LB/MMBTU 3-HR AVG	
<b>Emission Limit 2:</b>		
Standard Emission:		
Did factors, other then air polluti	on technology considerations influence the BACT decisions: U	
Case-by-Case Basis:	BACT-PSD	
Other Applicable Requirements:		
<b>Control Method:</b>	(N)	
Est. % Efficiency:		
Cost Effectiveness:	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
<b>Pollutant/Compliance Notes:</b>		
POLLUTANT NAME:	Particulate matter, total $< 2.5 \mu (TPM2.5)$	
CAS Number:	PM	
<b>Test Method:</b>	Unspecified	
Pollutant Group(s):	( Particulate Matter (PM) )	

0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 1:** 

<b>Emission Limit 2:</b>	
Standard Emission:	
Did factors, other then air polluti	on technology considerations influence the BACT decisions: U
Case-by-Case Basis:	BACT-PSD
<b>Other Applicable Requirements:</b>	
<b>Control Method:</b>	(N)
Est. % Efficiency:	
<b>Cost Effectiveness:</b>	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
<b>Pollutant/Compliance Notes:</b>	
POLLUTANT NAME:	Particulate matter, total (TPM)
CAS Number:	PM
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	( Particulate Matter (PM) )
<b>Emission Limit 1:</b>	0.0074 LB/MMBTU 3-HR AVG
<b>Emission Limit 2:</b>	
Standard Emission:	
Did factors, other then air polluti	on technology considerations influence the BACT decisions: U
Case-by-Case Basis:	BACT-PSD
<b>Other Applicable Requirements:</b>	
<b>Control Method:</b>	(N)
Est. % Efficiency:	
<b>Cost Effectiveness:</b>	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
<b>Pollutant/Compliance Notes:</b>	
POLLUTANT NAME:	Particulate matter, total $<$ 10 $\mu$ (TPM10)
CAS Number:	PM
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	( Particulate Matter (PM) )
<b>Emission Limit 1:</b>	0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 59.6100 TONS/MMCF 3-HR AVG

Emission Limit 2: 700000.0000 TONS/YEAR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Three (3) Package Boilers

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

**Throughput:** 243.00 MMBTU/H

**Process Notes:** Three (3) New Natural Gas-Fired 243 MMBtu/hr Package Boilers

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0100 LB/MMBTU 30-DAY AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Ultra Low NOx Burners

Est. % Efficiency: 70.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 50.0000 PPMV 3-HR AVG @ 3% O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 143952 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The economic analysis indicates the level of VOC reduction does not justify the use of catalytic oxidation.

Based on the excessive cost per ton of VOC removed per year, installing catalytic oxidation on the package

boilers is not considered a feasible option for reducing VOC emissions.

**POLLUTANT NAME:** Particulate matter, total (TPM)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU 3-HR AVG

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 59.6100 TONS/MMCF 3-HR AVG

Emission Limit 2: 376500.0000 TONS/YEAR COMBINED

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Five (5) Waste Heat Boilers

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** Natural Gas

**Throughput:** 50.00 MMBTU/H

**Process Notes:** Five (5) Natural Gas-Fired 50 MMBtu/hr Waste Heat Boilers. Installed in 1986.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 7.0000 PPMV 3-HR AVG @ 15 % O2

Emission Limit 2:
Standard Emission:
Did factors, other then air pollution technology considerations influence the BACT decisions: U
Case-by-Case Basis: BACT-PSD
Other Applicable Requirements:
Control Method: (A) Selective Catalytic Reduction
Est. % Efficiency: 81.000

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 50.0000 PPMV 3-HR AVG @ 15 % O2

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MMBTU 3-HR AVG

<b>Emission Limit 2:</b>	
Standard Emission:	
Did factors, other then air polluti	on technology considerations influence the BACT decisions: U
Case-by-Case Basis:	BACT-PSD
<b>Other Applicable Requirements:</b>	
<b>Control Method:</b>	(N)
Est. % Efficiency:	
<b>Cost Effectiveness:</b>	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
<b>Pollutant/Compliance Notes:</b>	
POLLUTANT NAME:	Particulate matter, total (TPM)
CAS Number:	PM
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	( Particulate Matter (PM) )
<b>Emission Limit 1:</b>	0.0074 LB/MMBTU 3-HR AVG
<b>Emission Limit 2:</b>	
Standard Emission:	
Did factors, other then air polluti	on technology considerations influence the BACT decisions: U
Case-by-Case Basis:	BACT-PSD
<b>Other Applicable Requirements:</b>	
<b>Control Method:</b>	(N)
Est. % Efficiency:	
<b>Cost Effectiveness:</b>	0 \$/ton
<b>Incremental Cost Effectiveness:</b>	0 \$/ton
Compliance Verified:	Unknown
<b>Pollutant/Compliance Notes:</b>	
POLLUTANT NAME:	Particulate matter, total $<$ 10 $\mu$ (TPM10)
CAS Number:	PM
<b>Test Method:</b>	Unspecified
Pollutant Group(s):	( Particulate Matter (PM) )
<b>Emission Limit 1:</b>	0.0074 LB/MMBTU 3-HR AVG

<b>Emission Limit 2:</b>		
Standard Emission:		
Did factors, other then air pollution technology considerations influence the BACT decisions: U		
Case-by-Case Basis:	BACT-PSD	
<b>Other Applicable Requirements:</b>		
<b>Control Method:</b>	(P) Limited Use (200 hr/yr)	
Est. % Efficiency:		
Cost Effectiveness:	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
Pollutant/Compliance Notes:		
POLLUTANT NAME:	Particulate matter, total $< 2.5 \mu (TPM2.5)$	
CAS Number:	PM	
<b>Test Method:</b>	Unspecified	
Pollutant Group(s):	( Particulate Matter (PM) )	
<b>Emission Limit 1:</b>	0.0074 LB/MMBTU 3-HR AVG	
<b>Emission Limit 2:</b>		
Standard Emission:		
Did factors, other then air polluti	on technology considerations influence the BACT decisions: U	
Case-by-Case Basis:	BACT-PSD	
Other Applicable Requirements:		
Control Method:	(N)	
Est. % Efficiency:		
Cost Effectiveness:	0 \$/ton	
<b>Incremental Cost Effectiveness:</b>	0 \$/ton	
Compliance Verified:	Unknown	
Pollutant/Compliance Notes:		
•		
POLLUTANT NAME:	Carbon Dioxide Equivalent (CO2e)	
CACN	002	

CAS Number: CO2e
Test Method: Unspecified
Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 59.6100 TONS/MMCF 3-HR AVG

Emission Limit 2: 131405.0000 TONS/YEAR COMBINED

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Startup Heater

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** Natural Gas

**Throughput:** 101.00 MMBTU/H

**Process Notes:** Natural Gas-Fired 101 MMBtu/hr Startup Heater. Installed in 1976.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0980 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Use (200 hr/yr)

Est. % Efficiency:

**Cost Effectiveness:** 55705 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The economic analysis indicates the level of NOx reduction does not justify installing selective catalytic

reduction. Based on the excessive cost per ton of NOx removed per year, installation of selective catalytic

reduction on the startup heater is not considered a feasible option for reducing NOx emissions.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0820 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Use (200 hr/yr)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Use (200 hr/yr)

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0074 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Limited Use (200 hr/yr)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0074 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Use (200 hr/yr)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 59.6100 TONS/MMCF
Emission Limit 2: 1200.0000 TONS/YEAR

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Use (200 hr/yr)

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Three (3) Flares

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** Natural Gas

**Throughput:** 1.25 MMBTU/H

Process Notes: 1.25 MMBtu/hr Ammonia Tank Flare, 0.4 MMBtu/hr Emergency Flare, and 1.25 MMBtu/hr Small Flare

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0054 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0074 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0074 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0074 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 59.6100 TONS/MMCF

Emission Limit 2: 1500.0000 TONS/YEAR COMBINED

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and

maintenance events)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Diesel Fired Well Pump

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel

**Throughput:** 2.70 MMBTU/H

**Process Notes:** 2.7 MMBtu/hr Diesel Fired Well Pump. Installed in 1966.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.4100 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.9500 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.3600 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.3100 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.3100 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) ) **Emission Limit 1:** 0.3100 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 37.2000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Gasoline Fired Fire Pump Engine

**Process Type:** 17.220 (Other Liquid Fuel & Liquid Fuel Mixtures)

**Primary Fuel:** Gasoline

**Throughput:** 2.10 MMBTU/H

**Process Notes:** 2.1 MMBtu/hr Gasoline-Fired Fire Pump Engine. Installed in 1978.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 1.6300 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.9900 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.0300 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.1000 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.1000 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.1000 LB/MMBTU

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 27.2000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited Operation of 168 hr/yr.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS** Ammonia Plant, CO2 Vent

NAME:

**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)

**Primary Fuel:** Natural Gas **Throughput:** 1800.00 T/D

**Process Notes:** The CO2 vent, vents excess CO2 from ammonia process. During times when ammonia plant is operating and Urea plant is not operating, all CO2

generated by ammonia plant operations is vented through this vent.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 11.4000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))
Emission Limit 1: 845486.0000 TONS/YEAR

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: H2 Vent

**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

Process Notes: H2 vent stack (dry gas vent) – vents during startup only

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 15222.0000 LB/STARTUP

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Limited use (200 hr/yr)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Two (2) Urea Granulation Units

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 1200.00 T/D

**Process Notes:** Two (2) Urea Granulation Units rated at 1200 tons per day (each).

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 90.0000 % CONTROL METHANOL WHICHEVER IS LESS RESTRICTIVE

Emission Limit 2: 2.0000 PPMV WHICHEVER IS LESS RESTRICTIVE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Wet Scrubber

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.2000 LB/TON OF UREA

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Wet Scrubber

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.2000 LB/TON OF UREA

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Wet Scrubber

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.2000 LB/TON OF UREA

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Wet Scrubber

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Urea UF-85 Storage Tank

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

**Throughput:** 30440.00 gallons

Process Notes: Urea UF-85 Storage Tank. 30,440 gallon capacity

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Wet Scrubber

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Two (2) Methyl-diethanol Amine (MDEA) Storage Tanks

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

**Throughput:** 158420.00 gallons

**Process Notes:** Two (2) MDEA Storage Tanks with rated capacities of 158,420 gallons and 16,000 gallons.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0020 TONS/YEAR COMBINED

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Submerged Fill Design

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Urea Ship Loading

**Process Type:** 99.110 (Agricultural Activities)

**Primary Fuel:** 

**Throughput:** 1000.00 tons urea/hour

**Process Notes:** The Urea Ship Loading Operations are conveyor systems used to load products from the Urea Plant into ships.

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0013 LB/TON OF UREA

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) Use of UF-85 (Hardening Agent), Product Coolers on Granulation Urea Process Lines, Loading into Partial

Enclosure, and use of a Telescoping Chute

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0011 LB/TON OF UREA

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) Use of UF-85 (Hardening Agent), Product Coolers on Granulation Urea Process Lines, Loading into Partial

Enclosure, and use of a Telescoping Chute.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): (Particulate Matter (PM))
Emission Limit 1: 0.0004 LB/TON OF UREA

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) Use of UF-85 (Hardening Agent), Product Coolers on Granulation Urea Process Lines, Loading into Partial

Enclosure, and use of a Telescoping Chute.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Urea Handling Units

**Process Type:** 99.110 (Agricultural Activities)

**Primary Fuel:** 

**Throughput:** 1000.00 tons urea/hour

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0050 GRAINS/DSCF 3 STACK TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (A) Fully Enclosed Conveyors and Fabric Filters

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GRAINS/DSCF 3 STACK TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Control Method: (A) Fully Enclosed Conveyors and Fabric Filters

Est. % Efficiency:99.000Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 GRAINS/DSCF 3 STACK TEST AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Fully Enclosed Conveyors and Fabric Filters

Est. % Efficiency:99.000Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** 2 Cell Cross-Flow Cooling Tower

**Process Type:** 99.110 (Agricultural Activities)

**Primary Fuel:** 

**Throughput:** 15000.00 gallons per minute

**Process Notes:** 2 Cell Cross-Flow Cooling Tower

**POLLUTANT NAME:** Particulate matter, fugitive

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 0.0020 % DRIFT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) High Efficiency Drift Eliminators

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0020 % DRIFT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) High Efficiency Drift Eliminators

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0020 % DRIFT

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) High Efficiency Drift Eliminators

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: Date Determination

**Last Updated:** 05/04/2016

Corporate/Company Name: MIDWEST FERTILIZER CORPORATION Permit Number: 129-33576-00059

Facility Name: MIDWEST FERTILIZER CORPORATION Permit Date: 06/04/2014 (actual)

Facility Contact: MICHAEL CHORLTON 3176258315 FRS Number: 110059696841

Facility Description: A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACILITY SIC Code: 2873

**Permit Type:** A: New/Greenfield Facility **NAICS Code:** 325311

**Permit URL:** HTTP://PERMITS.AIR.IDEM.IN.GOV/33576F.PDF

EPA Region: 5 COUNTRY: USA

**Facility County:** POSEY

Facility State: IN

Facility ZIP Code: 47620

**Permit Issued By:** INDIANA DEPT OF ENV MGMT, OFC OF AIR (Agency Name)

MR. MATT STUCKEY(Agency Contact) (317) 233-0203 mstuckey@idem.in.gov

**Other Agency Contact Info:** PERMIT WRITER:

DAVID MATOUSEK (317) 232-8253 DMATOUSE@IDEM.IN.GOV

**SECTION CHIEF:** 

NATHAN BELL (317) 233-5670 NBELL@IDEM.IN.GOV

**Permit Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** REFORMER FURNACE

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS, PROCESS GAS

**Throughput:** 950.64 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.3850 LB/MMCF 3-HR AVERAGEE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.3850 LB/MMCF 3-HR AVERAGE

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 9.0000 PPMVD @3% OXYGEN THIRTY DAY ROLLING AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR), LOW NOX BURNERS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 43.4500 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 T/MMCF 3-HR AVERAGE

Emission Limit 2: 486675.0000 TON CO2/YR MONTHLY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 80% THERMAL EFFICIENCY BASED ON HIGHER HEATING VALUE.

## Process/Pollutant Information

**PROCESS NAME:** STARTUP HEATER

**Process Type:** 15.110 (Natural Gas (includes propane & liquified petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 92.50 MMBTU/H

Process Notes: NATURAL GAS USAGE SHALL NOT EXCEED 18.14 MMCF/YEAR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 183.7000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 37.2300 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 T/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** TWO (2) NATURAL GAS FIRED COMBUSTION TURBINES

**Process Type:** 16.210 (Natural Gas (includes propane & liquified petroleum gas))

**Primary Fuel:** NATURAL GAS

**Throughput:** 283.00 MMBTU/H, EACH

Process Notes: NATURAL GAS FIRED, OPEN-SIMPLE CYCLE COMBUSTION TURBINES WITH HEAT RECOVERY

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0076 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0076 LB/MMBTU 3-HR AVERAGE

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 22.6500 PPMVD AT 15% OXYGEN 3-HR AVERAGE AT > 50% PEAK LOAD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) DRY LOW NOX COMBUSTORS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 0.0300 LB/MMBTU 3-HR AVERAGE AT > 50% PEAK LOAD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 2.5000 PPMVD AT 15% OXYGEN 1-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 12666.0000 BTU/KW-H, MINIMUM CONTINUOUS

Emission Limit 2: 116.8900 LB/MMBTU 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: CO2 EMISSIONS SHALL NOT EXCEED 144,890 TON/YEAR

#### Process/Pollutant Information

**PROCESS NAME:** THREE (3) AUXILARY BOILERS

**Process Type:** 16.210 (Natural Gas (includes propane & liquified petroleum gas))

Primary Fuel: NATURAL GAS

**Throughput:** 218.60 MMBTU/H, EACH

Process Notes: NATURAL GAS USAGE IN EACH BOILER NOT TO EXCEED 1501.91 MMCF/YR

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 20.4000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) LOW NOX BURNERS, FLUE GAS RECIRCULATION

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 37.2200 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 T/MMCF 3-HR AVERAGE

Emission Limit 2: 80.0000 % THERMAL EFFICIENCY (HHV)

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN: AIR INLET CONTROLS, HEAT

RECOVERY CONDENSATE AND BLOWDOWN HEAT RECOVERY

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** CO2 PURIFICATION PROCESS

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 2400.00 T/D AMMONIA

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0117 LB/TON AMMONIA 3-HR AVERAGE, 100% CO2 VENTING

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER CATALYST SELECTION

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0558 LB/TON OF AMMONIA 3-HR AVERAGE, 100% CO2 VENTING

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) PROPER CATALYST SELECTION

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 1.2750 TON/TON AMMONIA 3-HR AVERAGE, 100% VENTING

Emission Limit 2: 1232475.0000 TON CO2/YEAR MONTHLY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER CATALYST SELECTION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** UREA GRANULATION UNIT

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 1440.00 METRIC TONS PER DAY

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1630 LB/TON GRANULES 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY WET SCRUBBER

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1630 LB/TON GRANULES 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY WET SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.1630 LB/TON GRANULES 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY WET SCRUBBER

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** UREA GRANULE STORAGE WAREHOUSE

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 LB/H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** FUGITIVE EMISSIONS FROM EQUIPMENT LEAKS

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) LEAK DETECTION AND REPAIR (LDAR) PROGRAM USING 40 CFR 60, SUBPART VVA

**PROCEDURES** 

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** GRANULAR UAN TRUCK LOADOUT OPERATION

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1200 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1200 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1200 LB/H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** GRANULAR UAN RAIL LOADING OPERATION

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** UREA JUNCTION OPERATION

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS NAME: NITRIC ACID PLANT

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

#### 1840.00 METRIC TONS PER DAY

Throughput: Process Notes:

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0640 LB/TON NITRIC ACID 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.6130 LB/TON NITRIC ACID 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) CATALYTIC REACTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NITRIC ACID LIMIT IS BASED ON 100% NITRIC ACID.

## Process/Pollutant Information

**PROCESS NAME:** FRONT END FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 4.00 MMBTU/H

Process Notes: SSM VENTING IS LIMITED TO 336 HOURS PER YEAR. HEAT INPUT OF 4 MMBTU/HR IS FOR PILOT ONLY.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 595.4900 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 3240.1600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 47.2600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 116.8900 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 511.8100 TON/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** BACK END FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 4.00 MMBTU/H

Process Notes: SSM VENTING SHALL NOT EXCEEDD 336 HOURS PER YEAR, HEAT INPUT IS PILOT ONLY.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 624.9400 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 804.7600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 11.7300 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 116.8900 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 127.1200 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** AMMONIA STORAGE FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 1.50 MMBTU/H

Process Notes: HEAT INPUT IS FOR PILOT ONLY. SSM EMISSIONS HAVE SEPARATE LIMITS. SSM VENTING LIMITED 168 HOURS.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 125.0000 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 116.8900 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** TEN CELL EVAPORATIVE COOLING TOWER

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 147937.00 GPM

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 ML/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** SIX CELL EVAPORATIVE COOLING TOWER

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 88762.00 GPM

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1:0.0005 % DRIFT LOSS CONTINUOUSEmission Limit 2:2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Control Method: (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** DIESEL FIRED EMERGENCY GENERATOR

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: NO. 2, DIESEL
Throughput: 3600.00 BHP

**Process Notes:** ANNUAL OPERATING HOURS SHALL NOT EXCEED 500 HOURS. INSIGNIFICANT ACTIVITY WILL NOT BE TESTED.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.4600 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 2.6100 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3100 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 526.3900 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** FIRE PUMP

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** 

**Throughput:** 500.00 HP

**Process Notes:** OPERATION LIMITED TO 500 HOURS PER YEAR. INSIGNIFICANT ACTIVITY, WILL NOT BE TESTED.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.8300 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 2.6000 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 0.1410 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 527.4000 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** FUGITIVE DUST FROM PAVED ROADS AND PARKING LOTS

**Process Type:** 99.140 (Paved Roads)

**Primary Fuel:** 

**Throughput:** 10402.00 VEHICLE MILES TRAVELED

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL HAUL ROADS, DAILY SWEEPING WITH WET SUPPRESSION, PROMPT CLEANUP OF

ANY SPILLED MATERIAL.

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL HAUL ROADS, DAILY SWEEPING WITH WET SUPPRESSION, PROMPT CLEANUP OF

ANY SPILLED MATERIAL.

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL HAUL ROADS, DAILY SWEEPING WITH WET SUPPRESSION, PROMPT CLEANUP OF

ANY SPILLED MATERIAL.

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** RAW WATER PUMP

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** DIESEL, NO. 2

**Throughput:** 500.00 HP

Process Notes: OPERATION NOT TO EXCEED 500 HOURS PER YEAR. INSIGNIFICANT ACTIVITY, WILL NOT BE TESTED.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.8300 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 2.6000 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 0.1410 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 527.4000 G/BHP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Facility Information

RBLC ID: Date Determination

Corporate/Company Name: MIDWEST FERTILIZER CORPORATION Last Updated: 05/05/2016
Permit Number: 129-33576-00059

Facility Name: MIDWEST FERTILIZER CORPORATION Permit Date: 06/04/2014 (actual)

Facility Contact: MICHAEL CHORLTON 3176258315 FRS Number: 110059696841

Facility Description:A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACILITYSIC Code:2873

Permit Type:A: New/Greenfield FacilityNAICS Code:325311

Permit URL: HTTP://PERMITS.AIR.IDEM.IN.GOV/33576F.PDF

EPA Region: 5 COUNTRY: USA

**Facility County:** POSEY

Facility State: IN

Facility ZIP Code: 47620

Permit Issued By: INDIANA DEPT OF ENV MGMT, OFC OF AIR (Agency Name)

MR. MATT STUCKEY(Agency Contact) (317) 233-0203 mstuckey@idem.in.gov

**Other Agency Contact Info:** PERMIT WRITER:

DAVID MATOUSEK (317) 232-8253 DMATOUSE@IDEM.IN.GOV

SECTION CHIEF:

NATHAN BELL (317) 233-5670 NBELL@IDEM.IN.GOV

**Permit Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** REFORMER FURNACE

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS, PROCESS GAS

**Throughput:** 950.64 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.3850 LB/MMCF 3-HR AVERAGEE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.3850 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 9.0000 PPMVD @3% OXYGEN THIRTY DAY ROLLING AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR), LOW NOX BURNERS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 43.4500 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 59.6100 TON/MMCF 3-HR AVERAGE
Emission Limit 2: 486675.0000 T/YR CO2 MONTHLY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Pollutant/Compliance Notes:** 80% THERMAL EFFICIENCY BASED ON HIGHER HEATING VALUE.

# Process/Pollutant Information

**PROCESS NAME:** STARTUP HEATER

**Process Type:** 15.110 (Natural Gas (includes propane & liquified petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 92.50 MMBTU/H

Process Notes: NATURAL GAS USAGE SHALL NOT EXCEED 18.14 MMCF/YEAR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 183.7000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 37.2300 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 TON/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN, USE NATURAL GAS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** TWO (2) NATURAL GAS FIRED COMBUSTION TURBINES

**Process Type:** 16.210 (Natural Gas (includes propane & liquified petroleum gas))

**Primary Fuel:** NATURAL GAS

**Throughput:** 283.00 MMBTU/H, EACH

Process Notes: NATURAL GAS FIRED, OPEN-SIMPLE CYCLE COMBUSTION TURBINES WITH HEAT RECOVERY

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0076 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0076 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 22.6500 PPMVD AT 15% OXYGEN 3-HR AVERAGE AT > 50% PEAK LOAD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) DRY LOW NOX COMBUSTORS

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0300 LB/MMBTU 3-HR AVERAGE AT > 50% PEAK LOAD

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 2.5000 PPMVD AT 15% OXYGEN 1-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 12666.0000 BTU/KW-H, MINIMUM CONTINUOUS

Emission Limit 2: 116.8900 LB/MMBTU 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** CO2 EMISSIONS SHALL NOT EXCEED 144,890 TON/YEAR

# Process/Pollutant Information

**PROCESS NAME:** THREE (3) AUXILARY BOILERS

**Process Type:** 16.210 (Natural Gas (includes propane & liquified petroleum gas))

Primary Fuel: NATURAL GAS

**Throughput:** 218.60 MMBTU/H, EACH

**Process Notes:** NATURAL GAS USAGE IN EACH BOILER NOT TO EXCEED 1501.91 MMCF/YR

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 20.4000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) LOW NOX BURNERS, FLUE GAS RECIRCULATION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 37.2200 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 TON/MMCF 3-HR AVERAGE

Emission Limit 2: 80.0000 % THERMAL EFFICIENCY (HHV)

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) GOOD COMBUSTION PRACTICES AND PROPER DESIGN: AIR INLET CONTROLS, HEAT

RECOVERY CONDENSATE AND BLOWDOWN HEAT RECOVERY

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** CO2 PURIFICATION PROCESS

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 2400.00 T/D AMMONIA

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 0.0117 LB/TON AMMONIA 3-HR AVERAGE, 100% CO2 VENTING

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER CATALYST SELECTION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0558 LB/TON OF AMMONIA 3-HR AVERAGE, 100% CO2 VENTING

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) PROPER CATALYST SELECTION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 1.2750 TON/TON AMMONIA 3-HR AVERAGE, 100% VENTING

Emission Limit 2: 1232475.0000 T/YR CO2 MONTHLY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER CATALYST SELECTION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

PROCESS NAME: UREA GRANULATION UNIT

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 1440.00 METRIC T/D

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1630 LB/TON GRANULES 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY WET SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1630 LB/TON GRANULES 3-HR AVERAGE

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY WET SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1630 LB/TON GRANULES 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY WET SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** UREA GRANULE STORAGE WAREHOUSE

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )

Emission Limit 1: 0.1700 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

 $\label{eq:decisions} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} \quad N$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) BAGHOUSE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FUGITIVE EMISSIONS FROM EQUIPMENT LEAKS

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) LEAK DETECTION AND REPAIR (LDAR) PROGRAM USING 40 CFR 60, SUBPART VVA

**PROCEDURES** 

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** GRANULAR UAN TRUCK LOADOUT OPERATION

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

#### **Process Notes:**

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1200 LB/H 3-HR AVERAGE

**Emission Limit 2:** 

Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1200 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1200 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** GRANULAR UAN RAIL LOADING OPERATION

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** UREA JUNCTION OPERATION

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) FABRIC FILTER DUST COLLECTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS NAME: NITRIC ACID PLANT

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 1840.00 METRIC T/D

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0640 LB/TON NITRIC ACID 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.6130 LB/TON NITRIC ACID 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) CATALYTIC REACTOR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NITRIC ACID LIMIT IS BASED ON 100% NITRIC ACID.

#### Process/Pollutant Information

**PROCESS NAME:** FRONT END FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 4.00 MMBTU/H

Process Notes: SSM VENTING IS LIMITED TO 336 HOURS PER YEAR. HEAT INPUT OF 4 MMBTU/HR IS FOR PILOT ONLY.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 595.4900 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 3240.1600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 47.2600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 116.8900 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 511.8100 TON/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**PROCESS NAME:** BACK END FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 4.00 MMBTU/H

Process Notes: SSM VENTING SHALL NOT EXCEEDD 336 HOURS PER YEAR. HEAT INPUT IS PILOT ONLY.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 624.9400 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 804.7600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 11.7300 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 116.8900 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 127.1200 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** AMMONIA STORAGE FLARE **Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 1.50 MMBTU/H

**Process Notes:** HEAT INPUT IS FOR PILOT ONLY. SSM EMISSIONS HAVE SEPARATE LIMITS. SSM VENTING LIMITED 168 HOURS.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 125.0000 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 116.8900 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** TEN CELL EVAPORATIVE COOLING TOWER

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 147937.00 GPM

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 ML/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** SIX CELL EVAPORATIVE COOLING TOWER

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 88762.00 GPM

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT LOSS CONTINUOUS
Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** DIESEL FIRED EMERGENCY GENERATOR

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: NO. 2, DIESEL
Throughput: 3600.00 BHP

Process Notes: ANNUAL OPERATING HOURS SHALL NOT EXCEED 500 HOURS. INSIGNIFICANT ACTIVITY WILL NOT BE TESTED.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 4.4600 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 2.6100 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3100 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 526.3900 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FIRE PUMP

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** 

**Throughput:** 500.00 HP

**Process Notes:** OPERATION LIMITED TO 500 HOURS PER YEAR. INSIGNIFICANT ACTIVITY, WILL NOT BE TESTED.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

Emission Limit 2:

Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.8300 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 2.6000 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 0.1410 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 527.4000 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** FUGITIVE DUST FROM PAVED ROADS AND PARKING LOTS

**Process Type:** 99.140 (Paved Roads)

**Primary Fuel:** 

**Throughput:** 10402.00 VEHICLE MILES TRAVELED

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL HAUL ROADS, DAILY SWEEPING WITH WET SUPPRESSION, PROMPT CLEANUP OF

ANY SPILLED MATERIAL.

**Est. % Efficiency:** 90.000

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL HAUL ROADS, DAILY SWEEPING WITH WET SUPPRESSION, PROMPT CLEANUP OF

ANY SPILLED MATERIAL.

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL HAUL ROADS, DAILY SWEEPING WITH WET SUPPRESSION, PROMPT CLEANUP OF

ANY SPILLED MATERIAL.

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** RAW WATER PUMP

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** DIESEL, NO. 2

**Throughput:** 500.00 HP

Process Notes: OPERATION NOT TO EXCEED 500 HOURS PER YEAR. INSIGNIFICANT ACTIVITY, WILL NOT BE TESTED.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.8300 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 2.6000 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1410 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 527.4000 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: LA-0291 (final)

**Date Determination** 

Corporate/Company Name: SASOL CHEMICALS (USA) LLC

Last Updated: 09/19/2016
Permit Number: PSD-LA-778

**Permit Date:** 05/23/2014 (actual)

Facility Name: LAKE CHARLES CHEMICAL COMPLEX GTL UNIT

FRS Number: 110017418061

Facility Contact: ERIC RODRIGUEZ (281) 588-3761 ERIC.RODRIGUEZ@US.SASOL.COM

SIC Code: 2869

**Permit Type:** B: Add new process to existing facility

NAICS Code: 325110

**Permit URL:** 

**Facility Description:** 

**EPA Region:** 6

COUNTRY:

USA

**Facility County:** CALCASIEU

Facility State: LA

Facility ZIP Code: 70669

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Permit Notes:** Complete application date = date of administrative completeness This RBLC entry addresses the Gas-to-Liquids (GTL) Unit of the GTL

Project. GTL will utilize natural gas as a feedstock to produce fuel-grade hydrocarbon products, including liquefied petroleum gas (LPG), naphtha, paraffins, diesel, wax products, and base oil products. In the GTL process, natural gas will first be reformed into a synthesis gas;

the synthesis gas will then be converted into liquid hydrocarbons via a Fischer-Tropsch reaction. The Fisher-Tropsch synthesis is

followed by treatment and extraction units and product work-up units which produce the desired products.

## Process/Pollutant Information

**PROCESS NAME:** Process Heaters (EQT 690, 691, 692, 751, 752, & 753)

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 424.80 MMBTU/H

**Process Notes:** Heaters are subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 3.2000 LB/H HOURLY MAXIMUM
Emission Limit 2: 11.5500 T/YR ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1:3.2000 LB/H HOURLY MAXIMUMEmission Limit 2:11.5500 T/YR ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 25.2500 LB/H HOURLY MAXIMUM **Emission Limit 2:** 2.2800 T/YR ANNUAL MAXIMUM

Standard Emission: 0.0015 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Other
Other Test Method: CEMS

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 21.4700 LB/H HOURLY MAXIMUM **Emission Limit 2:** 15.5000 T/YR ANNUAL MAXIMUM

**Standard Emission:** 0.0100 LB/MMBTU 30-DAY ROLLING AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) Ultra low NOx burners (ULNB) and selective catalytic reduction (SCR)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be the use of SCR and ULNBs to limit NOx emissions to 0.01 lb/MM Btu (30-day

rolling average). During startup events, the SCR catalyst must be at the proper operating temperature before ammonia can be injected into the flue gas. Further, the SCR vendor has estimated that the ammonia distribution

system may be down for up to 32 hours per year for maintenance. During these periods (i.e.,

startup/shutdown/maintenance), which may total up to 168 hours per year, NOx emissions shall be limited to

0.05 lb/MM Btu (3-hour average).

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 15.0300 LB/H HOURLY MAXIMUM **Emission Limit 2:** 54.2700 T/YR ANNUAL MAXIMUM

Standard Emission: 0.0350 LB/MMBTU AVERAGE OF 3 1-HR. TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s):( Volatile Organic Compounds (VOC) )Emission Limit 1:2.3200 LB/H HOURLY MAXIMUMEmission Limit 2:8.3600 T/YR ANNUAL MAXIMUM

**Standard Emission:** 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 353891.0000 T/YR ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

# Process/Pollutant Information

**PROCESS NAME:** Process Heater (EQT 702)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 73.80 MMBTU/H

**Process Notes:** Heater is subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 2.0100 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5800 LB/HR HOURLY MAXIMUM Emission Limit 2: 2.0100 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 4.6100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.4000 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1:2.9800 LB/HR HOURLY MAXIMUMEmission Limit 2:10.2300 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 2.7400 LB/HR HOURLY MAXIMUM
Emission Limit 2: 9.4200 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.4200 LB/HR HOURLY MAXIMUM

Emission Limit 2: 1.4500 TPY ANNUAL MAXIMUM

Standard Emission: 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 61709.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue

gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming

combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of

310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Base Oils DW Reactor Feed Heater (EQT 776)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 31.00 MMBTU/H

**Process Notes:** Heater is subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.8400 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.2600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.8400 TPY ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 2.0900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 1.3500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 4.3000 TPY ANNUAL MAXIMUM

Standard Emission: 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 1.2400 LB/HR HOURLY MAXIMUM Emission Limit 2: 3.9600 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.6100 TPY ANNUAL MAXIMUM

Standard Emission: 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 22757.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and debris in the intake air supply); use of refractory materials that provide the highest insulating capacity practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Base Oils Light Vacuum Feed Heater (EQT 777)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 71.20 MMBTU/H

**Process Notes:** Heater is subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.9400 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.9400 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 4.4500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.3800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** OPERATING PERMIT

Control Method: (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.8800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 9.8700 TPY ANNUAL MAXIMUM

Standard Emission: 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 2.6500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 9.0900 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.4100 LB/HR HOURLY MAXIMUM

Emission Limit 2: 1.4000 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 54343.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Base Oils Heavy Vacuum Feed Heater (EQT 778)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 10.00 MM BTU/H

**Process Notes:** Heater is subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.1100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.2700 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.1100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.2700 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.8600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0500 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.5500 LB/HR HOURY MAXIMUM Emission Limit 2: 1.3900 TPY ANNUAL MAXIMUM

Standard Emission: 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.5100 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 1.2800 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.2000 TPY ANNUAL MAXIMUM

Standard Emission: 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 6235.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming

combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

#### Process/Pollutant Information

PROCESS NAME: HC Reactor Feed Heaters (EQT 736 & 754)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 70.80 MMBTU/H

**Process Notes:** Heaters are subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.9200 TPY ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.9200 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 4.4300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.3800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.8600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 9.8200 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 2.6400 LB/HR HOURLY MAXIMUM
Emission Limit 2: 9.0400 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.4100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.3900 TPY ANNUAL MAXIMUM

Standard Emission: 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 43002.0000 TPY ANNUAL MAXIMUM (EQT 736) Emission Limit 2: 44252.0000 TPY ANNUAL MAXIMUM (EQT 754)

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

## Process/Pollutant Information

**PROCESS NAME:** Fractionator Feed Heaters (EQT 737 & 774)

**Process Type:** 12.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 248.70 MMBTU/H

**Process Notes:** Heaters are subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.8900 LB/HR HOURLY MAXIMUM Emission Limit 2: 6.7600 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.8900 LB/HR HOURLY MAXIMUM Emission Limit 2: 6.7600 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 14.8900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.3300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 9.6200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 34.4900 TPY ANNUAL MAXIMUM

Standard Emission: 0.0380 LB/MMBTU AVERAGE OF 3 1-HR. TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 8.8600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 31.7600 TPY ANNUAL MAXIMUM

Standard Emission: 0.0350 LB/MMBTU AVERAGE OF 3 1-HR. TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.3700 LB/HR HOURLY MAXIMUM

Emission Limit 2: 4.8900 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 153286.0000 TPY ANNUAL MAXIMUM (EQT 737)
Emission Limit 2: 157892.0000 TPY ANNUAL MAXIMUM (EQT 774)

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue

gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming

combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** DW Reactor Feed Heaters (EQT 738 & 775)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 56.80 MMBTU/H

**Process Notes:** Heaters are subject to 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.4600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.5400 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.4600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.5400 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 3.6100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.3000 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels with a sulfur content of no more than 0.005 gr/scf (annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.3300 LB/HR HOURLY MAXIMUM Emission Limit 2: 7.8700 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 2.1500 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 7.2500 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 34317.0000 TPY ANNUAL MAXIMUM (EQT 738) Emission Limit 2: 35302.0000 TPY ANNUAL MAXIMUM (EQT 775)

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of natural gas as feedstock and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail filtration of inlet air (to prevent reduced performance caused by dust and

debris in the intake air supply); use of refractory materials that provide the highest insulating capacity

practicable; proper insulation of equipment and piping to minimize heat loss; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with BACT determination for CO and VOC emissions; compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration; and use of air preheaters to heat incoming combustion air. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of

310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.1200 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and the tune-up provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

### Process/Pollutant Information

**PROCESS NAME:** High Temperature Paint Maintenance Activities (ACT 4)

**Process Type:** 99.999 (Other Miscellaneous Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 62.1000 LB/HR HOURLY MAXIMUM
Emission Limit 2: 19.8300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good housekeeping practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Base Oils - Loading (EQT 835)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 144.90 MM GALS/YR

**Process Notes:** HOURLY THROUGHPUT IS 218,700 GALS/HR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 8.4100 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.7900 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Best maintenance practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Diesel Berth 1 & 2 Loading (EQT 830 & 832)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 1100.14 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER BERTH. HOURLY THROUGHPUT IS 136,856 GALS/HR PER BERTH.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 1.4900 LB/HR HOURLY MAXIMUM

Emission Limit 2: 5.9900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Best maintenance practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Group 2 transfer racks under 40 CFR 63 Subpart FFFF.

### Process/Pollutant Information

**PROCESS NAME:** GTL Unit Fugitive Emissions (FUG 15)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 68.3700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Leak detection and repair (LDAR) program: 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 89.1300 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

Control Method: (P) Leak detection and repair (LDAR) program: 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 1214.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Leak detection and repair (LDAR) program: 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event

any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

## Process/Pollutant Information

**PROCESS NAME:** Vapor Combustor (EQT 834)

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0400 LB/HR HOURLY MAXIMUM Emission Limit 2: 0.1700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing,

and temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0400 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing,

and temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0030 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0100 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing,

and temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.0900 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 9.1300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing,

and temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 4.1600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 18.2300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing,

and temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 15.4800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 67.7900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing,

and temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 9753.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of 40 CFR Subpart FFFF, including, but

not limited to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature monitoring requirements of 40 CFR 63.988. CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be

revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

PROCESS NAME: Multi-Point Ground Flares (EQT 836 & 837)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total < 10 μ (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 170.8400 LB/HR HOURLY MAXIMUM Emission Limit 2: 7.1400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 170.8400 LB/HR HOURLY MAXIMUM Emission Limit 2: 7.1400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.9500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 1072.8600 LB/HR HOURLY MAXIMUM Emission Limit 2: 44.8600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the

volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 5837.6200 LB/HR HOURLY MAXIMUM Emission Limit 2: 243.9600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 461.8100 LB/HR HOURLY MAXIMUM

Emission Limit 2: 55.0800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 115911.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFFF and SS,

including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987; minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event

any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS** Process Vents

NAME:

**Process** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

Type:
Primary
Fuel:

Throughput: 0

Process Includes: Process Condensate Stripper (120-VC-001, EQT 0693) Autothermal Reformer (120-VR-108, EQT 0694) Lift Reactor (130-VR-105, EQT

**Notes:** 0695) Wash Water Column (135-VC-001, EQT 0696) CO2 Strippers (135-VC-003, EQT 0697) Dry Condensate Rectifier (135-VC-004, EQT 0698)

Primary Separation Column (140-VC-002, EQT 0699) Reaction Vessel (145-VD-001A, EQT 0700) Reaction Vessel (145-VD-001B, EQT 0701) Main Fractionation Column (148-VC-101, EQT 0730) Side Stripper FT80 (148-VC-102, EQT 0731) Side Stripper FT70 (148-VC-103, EQT 0732) Side Stripper FT60 (148-VC-104, EQT 0733) Side Stripper FT50 (148-VC-105, EQT 0734) Emulsifier (148-VD-802, EQT 0735) Light Cut Column (32-VC-001, EQT 0799) Heavy Cut Column (32-VC-002, EQT 0800) Oxygenate Extractor (32-VC-003, EQT 0801) Raffinate Stripper (32-VC-004, EQT 0802) Solvent Recovery Column (32-VC-005, EQT 0803) Regeneration Knockout Drum (32-VD-007, EQT 0804) Heavy Cut Seal Fluid Drum

(32-VD-012, EQT 0805) Deethaniser (555-VC-001, EQT 0807)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

**Control Method:** (A) Flare

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing process vents located in the GTL Unit to Multi-Point Ground Flare

181-MPGF-001 (EQT 0836) or 281-MPGF-002 (EQT 0837).

## Process/Pollutant Information

**PROCESS NAME:** Heat Exchangers

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with the heat exchange system requirements of 40 CFR 63.104

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Sulfuric Acid Storage Tank (EQT 828)

**Process Type:** 62.020 (Inorganic Liquid/Gas Storage & Handling)

**Primary Fuel:** 

**Throughput:** 2.60 MM GALS/YR

**Process Notes:** Tank capacity = 45,000 gals

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown
Pollutant/Compliance Notes: BACT limit is

## Process/Pollutant Information

PROCESS NAME: Naphtha Berth 1 & 2 Loading (EQT 831 & 833)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 1100.00 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER BERTH.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Control Method: (A) Vapor combustor

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing VOC emissions to Vapor Combustor 599-XP-024.

# Process/Pollutant Information

**PROCESS NAME:** Naphtha Storage Tanks (EQT 815, 816, & 817)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 439.00 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 10.2 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 10.8500 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS , MACT , SIP , OPERATING PERMIT

**Control Method:** (P) Internal floating roof (IFR)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Consistent with 40 CFR 63.2470(a) and Table 4 to Subpart FFFF, the floating roof, recordkeeping, and

reporting requirements of 40 CFR 63 Subpart WW shall apply.

### Process/Pollutant Information

**PROCESS NAME:** P/O Rundown Tanks (EQT 818, 819, 820, & 821)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 202.00 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 329,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.5700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT Control Method: (P) Internal floating roof (IFR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Consistent with 40 CFR 63.2470(a) and Table 4 to Subpart FFFF, the floating roof, recordkeeping, and

reporting requirements of 40 CFR 63 Subpart WW shall apply.

### Process/Pollutant Information

**PROCESS NAME:** Statutory Storage Tank (EQT 826)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 439.00 MM GALS/YR

**Process Notes:** TANK CAPACITY = 12.1 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 12.3800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, SIP, OPERATING PERMIT

**Control Method:** (P) Internal floating roof (IFR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Consistent with 40 CFR 63.2470(a) and Table 4 to Subpart FFFF, the floating roof, recordkeeping, and

reporting requirements of 40 CFR 63 Subpart WW shall apply.

### Process/Pollutant Information

**PROCESS NAME:** Petroleum Wax Storage Tank (EQT 827)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 79.00 MM GALS/YR

**Process Notes:** TANK CAPACITY = 800,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.7600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Fresh Amine Storage Tank (EQT 829)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 79.00 MM GALS/YR

**Process Notes:** TANK CAPACITY = 16,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0040 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Process Licensor Methanol Tank Nos. 1 & 2 (EQT 797 & 798)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 26.80 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 207,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{MACT}$  ,  $\operatorname{SIP}$  ,  $\operatorname{OPERATING}$  PERMIT

**Control Method:** (P) Internal floating roof (IFR)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Consistent with 40 CFR 63.2470(a) and Table 4 to Subpart FFFF, the floating roof, recordkeeping, and

reporting requirements of 40 CFR 63 Subpart WW shall apply.

### Process/Pollutant Information

**PROCESS** Storage Tanks Routed to Flare

NAME:

**Process** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

Type:
Primary
Fuel:

**Throughput:** 0

Process Includes: Methanol Drainage Tank (EQT 0806) Clean Wax Tank (EQT 0739) Extracted Wax Tank (EQT 0740) Clean Wax Tank (EQT 0779) UCO

Notes: Tank (EQT 0780) GTLBO XLN Grade Prover Tank (EQT 0781) GTLBO XLN Grade Prover Tank (EQT 0782) GTLBO LN Grade Prover Tank (EQT

0783) GTLBO LN Grade Prover Tank (EQT 0784) GTLBO MN Grade Prover Tank (EQT 0785) GTLBO MN Grade Prover Tank (EQT 0786) GTLBO HN Grade Prover Tank (EQT 0787) GTLBO HN Grade Prover Tank (EQT 0788) Diesel/Naphtha Rework Tank (EQT 0808) Condensate Recovery Tank (EQT 0810) Raw Wax Tank (EQT 0811) Raw Wax Tank (EQT 0812) Raw Wax Tank (EQT 0813) P/O Rework

Tank (EQT 0814) Maintenance Wax Tank (EQT 0963) Benzene Stripper Feed Tank (EQT 0962)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: BACT is determined to be routing VOC emissions to Multi-Point Ground Flare 181-MPGF-001 (EQT 0836) or

281-MPGF-002 (EQT 0837). BACT for the Benzene Stripper Feed Tank is determined to be routing VOC

emissions to Multi-Point Ground Flare COMON2-GF-1 (EQT 0839).

#### Process/Pollutant Information

**PROCESS NAME:** GTLBO XLN Grade Finished Product Tanks (EQT 789 & 790)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 45.30 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 2.18 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.0600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** GTLBO LN Grade Finished Product Tanks (EQT 791 & 792)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 55.30 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 2.63 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.3400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** GTLBO MN Grade Finished Product Tanks (EQT 793 & 794)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 27.70 MM GALS

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 1.31 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.5900 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** GTLBO HN Grade Finished Product Tanks (EQT 795 & 796)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 24.90 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 1.16 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.5200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** FT50R Prover Tanks (EQT 703 & 704)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 230.70 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 106,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.8600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT50R Storage Tank (EQT 705)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 230.70 MM GALS/YR

**Process Notes:** TANK CAPACITY = 368,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 6.9800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT60R Prover Tanks (EQT 706 & 707)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 157.70 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 39,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.8600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT60R Storage Tank (EQT 708)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 157.70 MM GALS/YR

**Process Notes:** TANK CAPACITY = 268,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 4.8400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT70R Prover Tanks (EQT 709 & 710)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 45.70 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 23,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.1700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** FT70R Storage Tank (EQT 711)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 45.70 MM GALS/YR

**Process Notes:** TANK CAPACITY = 303,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.3700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** FT80R Prover Tanks (EQT 712 & 713)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 94.60 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 24,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.3200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT50H Prover Tanks (EQT 714 & 715)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 238.60 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 60,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.8500 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT50H Storage Tank (EQT 716)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 254.40 MM GALS/YR

**Process Notes:** TANK CAPACITY = 415,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 7.7400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** FT60H Prover Tanks (EQT 717 & 718)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 231.80 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 56,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.6800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** FT60H Storage Tank (EQT 719)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 254.40 MM GALS/YR

**Process Notes:** TANK CAPACITY = 280,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 7.1600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT70H Prover Tanks (EQT 720 & 721)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 251.80 MM GALS/YR

Process Notes: THROUGHPUT IS PER TANK TANK CAPACITY = 62,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 6.1700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** FT50HD Prover Tanks (EQT 722 & 723)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 95.70 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 27,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.3600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT60HD Prover Tanks (EQT 724 & 725)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 49.40 MM GALS/YR

**Process Notes:** THROUGHPUT IS PER TANK TANK CAPACITY = 16,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.2300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Wax Storage Tank (EQT 726)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 5.30 MM GALS/YR

**Process Notes:** TANK VOLUME = 24,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.2300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Product Storage Tank (EQT 727)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 104.10 MM GALS/YR

**Process Notes:** TANK VOLUME = 40,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.6200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Product Storage Tank (EQT 728)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 10.00 MM GALS/YR

**Process Notes:** TANK VOLUME = 40,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.4100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Wax Storage Tank (EQT 729)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 228.60 MM GALS/YR

**Process Notes:** TANK VOLUME = 186,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 6.1600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT50 Non-Deoiled/Non HDT Wax Tank (EQT 741)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 44.00 MM GALS/YR

**Process Notes:** TANK VOLUME = 1.97 MM GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 6.2800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT50 HDT and Deoiled Wax Tank (EQT 742)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 1.39 MM GALS/YR

**Process Notes:** TANK VOLUME = 69,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.2000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** FT50 HDT Deoiled Blended Wax Tank (EQT 743)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 25.50 MM GALS/YR

**Process Notes:** TANK VOLUME = 500,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.7300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** FT60 HDT and Deoiled Wax Tank (EQT 746)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 4.63 MM GALS/YR

**Process Notes:** TANK VOLUME = 274,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.7300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT50 Emulsion Wax Tank (EQT 744)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 57.00 MM GALS/YR

**Process Notes:** TANK VOLUME = 500,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.6600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT60 Non-Deoiled Wax Tank (EQT 745)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 57.00 MM GALS/YR

**Process Notes:** TANK VOLUME = 545,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.6600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT60 Blends Wax Tank (EQT 747)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 2.31 MM GALS/YR

**Process Notes:** TANK VOLUME = 91,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FT70 Non-Deoiled/Non HDT Wax Tank (EQT 748)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 4.63 MM GALS/YR

**Process Notes:** TANK VOLUME = 180,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT70 HDT Wax Tank (EQT 749)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 4.63 MM GALS/YR

**Process Notes:** TANK VOLUME = 271,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FT80 Non-Deoiled/Non HDT Wax Tank (EQT 750)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 9.26 MM GALS/YR

**Process Notes:** TANK VOLUME = 635,000 GALS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.3300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Fixed roof; best maintenance practices consistent with Sasol's written plan developed pursuant to LAC

33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: LA-0296 (final) Date Determination

Corporate/Company Name: SASOL CHEMICALS (USA) LLC

Last Updated: 04/28/2017

Permit Number: PSD-LA-779

Facility Name: LAKE CHARLES CHEMICAL COMPLEX LDPE UNIT Permit Date: 05/23/2014 (actual)

Facility Contact: ERIC RODRIGUEZ (281) 588-3761 ERIC.RODRIGUEZ@US.SASOL.COM FRS Number: 110017418061

**Facility Description:** The Low Density Polyethylene (LDPE) Unit will produce LDPE by the high pressure **SIC Code:** 2821

polymerization of ethylene.

**Permit Type:** B: Add new process to existing facility NAICS Code: 325211

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: CALCASIEU

Facility State: LA
Facility ZIP Code: 70669

**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Permit Notes:** Complete application date = date of administrative completeness This RBLC entry addresses the Low Density Polyethylene (LDPE) Unit of

the Lake Charles Cracker Project (LCCP). This entry also addresses the Emergency Diesel Generators associated with the entire LCCP, as

all of the permitted units are identical.

#### Process/Pollutant Information

**PROCESS** LLPDE/LDPE Multi-Point Ground Flare (EQT 640)

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: The flare controls the following process vents: Purgas C-1 (LDPE-C-1, EQT 0641) Compressor Area C-2 (LDPE-C-2, EQT 0642) Comonomer

Degassing Column C-3 (LDPE-C-3, EQT 0643) Isopentane Degassing Column C-4 (LDPE-C-4, EQT 0644) Purification Bed Regeneration C-7

(LDPE-C-7, EQT 0645) Analyzer Vents C-8 (LDPE-C-8, EQT 0646) Vent Recovery Accumulator C-9 (LDPE-C-9, EQT 0647)

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 37.5100 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 4.2700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use

of natural gas as pilot gas.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 37.5100 LB/HR HOURLY MAXIMUM Emission Limit 2: 4.2700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use

of natural gas as pilot gas.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 1.1500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use

of natural gas as pilot gas.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 174.0900 LB/HR HOURLY MAXIMUM Emission Limit 2: 39.2500 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 947.2500 LB/HR HOURLY MAXIMUM Emission Limit 2: 259.0600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use

of natural gas as pilot gas.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 305.0800 LB/HR HOURLY MAXIMUM

Emission Limit 2: 561.2200 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use

of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 68285.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously

monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as

pilot gas.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as pilot gas. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the

need to modify the permit.

# Process/Pollutant Information

**PROCESS NAME:** LDPE Fugitives (FUG 13)

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 17.4400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 60 Subpart VVa

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** LDPE Thermal Oxidizer (EQT 648)

NAME:

**Process** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

Type: Primary

**Fuel:** 

**Throughput:** 122.00 MM BTU/HR

Process The thermal oxidizer controls the following process vents: Blender M-301 (LDPE-M-301, EQT 0649) Blender M-302 (LDPE-M-302, EQT 0650)

Notes: Blender M-303 (LDPE-M-303, EQT 0651) Blender M-304 (LDPE-M-304, EQT 0652) Blender M-305 (LDPE-M-305, EQT 0653) Blender M-306

(LDPE-M-306, EQT 0654) Blender M-307 (LDPE-M-307, EQT 0655) Blender M-308 (LDPE-M-308, EQT 0656) Extruder Pellet Hopper BN-700 (LDPE-BN-700, EQT 0657) Pellet Silo BN-801A (LDPE-BN-801A, EQT 0658) Pellet Silo BN-801B (LDPE-BN-801B, EQT 0659) Pellet Silo BN-801C (LDPE-BN-801C, EQT 0660) Pellet Silo BN-801D (LDPE-BN-801D, EQT 0661) Pellet Silo BN-801E (LDPE-BN-801E, EQT 0662) Pellet Silo BN-801F (LDPE-BN-801F, EQT 0663) Centrifugal Dryer Vent D-201 (LDPE-D-201, EQT 0668) Pellet Elutriation Separator / Vent S-353

(LDPE-S-353, EQT 0669) Pellet Elutriation Separator / Vent S-354 (LDPE-S-354, EQT 0670)

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.3600 LB/HR HOURLY MAXIMUM Emission Limit 2: 3.9800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.3600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 3.9800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.1600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.4800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 8.2900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 24.2000 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 45.1000 LB/HR HOURLY MAXIMUM

Emission Limit 2: 131.7000 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 11.7600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 34.3400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 42165.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with the applicable provisions of 40 CFR 63 Subpart SS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the applicable provisions of Subpart SS, including, but not limited

to, the closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and

temperature monitoring requirements of 40 CFR 63.988. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be

revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Bin B207 Vent (EQT 666)

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable process weight rate limitation established by LAC 33:III.1311.B.

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable process weight rate limitation established by LAC 33:III.1311.B.

# Process/Pollutant Information

**PROCESS NAME:** Bin B208 Vent (EQT 667)

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0500 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.1900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (A) Fabric filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be use of fabric filters to limit PM10 emissions to 0.02 gr/dscf. Fabric filters shall be

maintained and operated properly. Filter vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months and whenever visual checks indicate maintenance may be necessary. Elements shall be changed as necessary. Records of visual checks and maintenance inspections shall

be kept on site for 5 years.

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (A) Fabric filter

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be use of fabric filters to limit PM2.5 emissions to 0.02 gr/dscf. Fabric filters shall be

maintained and operated properly. Filter vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months and whenever visual checks indicate maintenance may be necessary. Elements shall be changed as necessary. Records of visual checks and maintenance inspections shall

be kept on site for 5 years.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0400 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1500 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** W209 Drop Point (EQT 672)

**Process Type:** 63.999 (Other Polymer and Resin Manufacturing Sources)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0010 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0010 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** HOURLY BACT LIMIT IS REPRESENTED AS

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0010 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.0010 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** HOURLY AND ANNUAL BACT LIMITS ARE REPRESENTED AS

# Process/Pollutant Information

**PROCESS NAME:** Emergency Diesel Generators (EQTs 622, 671, 773, 850, 994, 995, 996, 1033, 1077, 1105, & 1202)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** Diesel

**Throughput:** 2682.00 HP

**Process Notes:** Non-emergency use is limited to 100 hours per year.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.8800 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.0400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: PM limit is 0.20 g/kW-hr. BACT is determined to be compliance with the limitations imposed by 40 CFR 60

Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe

operation) designed to maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.8800 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.0400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, NSPS

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: PM limit is 0.20 g/kW-hr. BACT is determined to be compliance with the limitations imposed by 40 CFR 60

Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe

operation) designed to maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 0.0300 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.0020 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Fuel sulfur content is limited to 15 ppm. BACT is determined to be compliance with the limitations imposed by

40 CFR 60 Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with

safe operation) designed to maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 27.3700 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.3700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, NSPS

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NOx + NMHC limit is 6.40 g/kW-hr. BACT is determined to be compliance with the limitations imposed by 40

CFR 60 Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe

operation) designed to maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 15.4300 LB/HR HOURLY MAXIMUM Emission Limit 2: 0.7700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** CO limit is 3.50 g/kW-hr. BACT is determined to be compliance with the limitations imposed by 40 CFR 60

Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe

operation) designed to maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.8500 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the limitations imposed by 40 CFR 60 Subpart IIII and its

associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to

maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 56.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; operating the engine in accordance with the engine manufacturer's

instructions and/or written procedures (consistent with safe operation) designed to maximize combustion

efficiency and minimize fuel usage.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the limitations imposed by 40 CFR 60 Subpart IIII and its

associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize combustion efficiency and minimize fuel usage. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be

revised accordingly without the need to modify the permit.

# **Facility Information**

RBLC ID: LA-0299 (final) Date Determination

Corporate/Company Name: SASOL CHEMICALS (USA) LLC Last Updated: 04/28/2017

Permit Number: PSD-LA-779

Facility Name: LAKE CHARLES CHEMICAL COMPLEX ETHOXYLATION UNIT Permit Date: 05/23/2014 (actual)

Facility Contact: ERIC RODRIGUEZ (281) 588-3761 ERIC.RODRIGUEZ@US.SASOL.COM FRS Number: 110017418061

Facility Description: SIC Code: 2869

**Permit Type:** B: Add new process to existing facility **NAICS Code:** 325199

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: CALCASIEU

Facility State: LA Facility ZIP Code: 70669

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Permit Notes:** Complete application date = date of administrative completeness This RBLC entry addresses the expansion of the Ethoxylation Unit.

Two new ethoxylate trains (ETO-4 and ETO-5) will be added as part of the Lake Charles Cracker Project. These trains will produce

ethoxylated alcohols.

#### Process/Pollutant Information

**PROCESS NAME:** ETO/Guerbet Elevated Flare (EQT 1079)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2300 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.0900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1:0.2300 LB/HR HOURLY MAXIMUMEmission Limit 2:0.0900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.2100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1100 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 8.5100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 3.2600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 46.3200 LB/HR HOURLY MAXIMUM Emission Limit 2: 17.7600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 33.2900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 5.4800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 3986.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The perr

The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** ETO/Guerbet Vapor Combustion Unit II (EQT 1080)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.7600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.7600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 0.2100 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.8900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 8.7200 LB/HR HOURLY MAXIMUM Emission Limit 2: 27.7200 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 47.4700 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 150.8300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 31.1900 LB/HR HOURLY MAXIMUM

Emission Limit 2: 46.2800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow

of steam to the flare tips.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 54833.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart PPP

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the

lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the

need to modify the permit.

# Process/Pollutant Information

**PROCESS NAME:** Fugitives (FUG 21)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 10.9200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** #4 Product Storage Tanks (EQTs 1081 & 1082)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 15.00 MM GALS/YR

**Process Notes:** Tank capacity = 146,800 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 13.0100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total. BACT limit is per tank.

#### Process/Pollutant Information

**PROCESS NAME:** #4 Product Drums (EQTs 1083, 1084, 1086, & 1086)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 5.00 MM GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.5400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total. BACT limit is per tank.

#### Process/Pollutant Information

**PROCESS NAME:** #5 Product Drums (EQTs 1087, 1088, 1089, & 1090)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 2.50 MM GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.5000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total. BACT limit is per tank.

#### Process/Pollutant Information

PROCESS NAME: Alcohol Storage Tanks (EQTs 1091, 1092, 1093, & 1094)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 5.00 MM GALS/YR

**Process Notes:** Tank capacity = 146,800 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 10.9400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total. BACT limit is per tank.

#### Process/Pollutant Information

PROCESS NAME: Alcohol D150-911 (EQT 1095)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 893271.00 GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.9600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total.

# Process/Pollutant Information

**PROCESS NAME:** #4 Alcohol Feed Drum (EQT 1096)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 3.50 MM GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total.

#### Process/Pollutant Information

**PROCESS NAME:** #5 Alcohol Feed Drum (EQT 1097)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 2.50 MM GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.3000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total.

### Process/Pollutant Information

**PROCESS NAME:** #4 Utility Drum (EQT 1098)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 3.50 MM GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total.

# Process/Pollutant Information

**PROCESS NAME:** #5 Utility Drum (EQT 1099)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 2.50 MM GALS/YR

**Process Notes:** Tank capacity = 27,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total.

#### Process/Pollutant Information

**PROCESS NAME:** Novel Catalyst Drum (EQT 1100)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 50000.00 GALS/YR

**Process Notes:** Tank capacity = 14,400 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.4400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total.

#### Process/Pollutant Information

**PROCESS NAME:** Product Storage Tanks (EQTs 1101 & 1102)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 8.40 MM GALS/YR

**Process Notes:** Tank capacity = 124,520 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.2200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be a fixed roof to limit annual VOC emissions to the above total. BACT limit is per tank.

# Process/Pollutant Information

**PROCESS NAME:** ETO Loading Rack (EQT 1103)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 146.63 MM GALS/YR

**Process Notes:** Maximum operating rate = 1000 gals/min

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 26.9800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 28.9400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

 $\begin{tabular}{ll} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} & \textbf{U} \\ \end{tabular}$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Best maintenance practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Alcohol Loading Rack (EQT 1104)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 37.78 MM GALS/YR

**Process Notes:** Maximum operating rate = 420 gals/min

> **POLLUTANT NAME:** Volatile Organic Compounds (VOC)

**CAS Number:** VOC

**Test Method:** Unspecified

(Volatile Organic Compounds (VOC)) **Pollutant Group(s): Emission Limit 1:** 32.7100 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 22.8300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

**BACT-PSD Case-by-Case Basis:** 

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Best maintenance practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS** Heat Exchangers

NAME:

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** Throughput:

Process Notes: Includes the following sources: Vacuum Pretreatment Condenser (ETO-X-150-412, EQT 1153) Secondary Cooler (ETO-X-150-423, EQT 1154)

Post-Treatment Secondary Circuit Cooler (ETO-X-150-432, EQT 1155) Vacuum Pretreatment Condenser (ETO-X-150-512, EQT 1156) Secondary

Cooler (ETO-X-150-523, EQT 1157) Post-Treatment Secondary Circuit Cooler (ETO-X-150-532, EQT 1158)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

VOC **CAS Number:** 

**Test Method:** Unspecified **Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

Control Method: (P) Compliance with 40 CFR 63.104

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the heat exchange system requirements of 40 CFR 63.104

(regardless if it is otherwise applicable). These provisions require Sasol to monitor the cooling water for the presence of one or more organic hazardous air pollutants or other representative substances whose presence in cooling water indicates a leak, repair any leaks that are detected, and confirm that the heat exchange system is no

longer leaking following repair activities. This section also prescribes recordkeeping and reporting

requirements.

#### Process/Pollutant Information

PROCESS NAME: ETO4 & ETO5 Pre- and Post-Treatment Vessels (EQTs 1145, 1147, 1148, & 1150)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above storage vessels through a closed vent system to the ETO/Guerbet

Elevated Flare (EQT 1079), to the ETO/Guerbet Vapor Combustion Unit II (EQT 1080), or to an equivalent

flare.

# Process/Pollutant Information

**PROCESS NAME:** Organic Byproduct Collector (EQT 1146)

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Flare

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to the ETO/Guerbet

Elevated Flare (EQT 1079) or to ETO/Guerbet Vapor Combustion Unit II (EQT 1080).

#### Process/Pollutant Information

**PROCESS NAME:** Aqueous Byproduct Collector (EQT 1149)

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to the ETO/Guerbet

Elevated Flare (EQT 1079) or to ETO/Guerbet Vapor Combustion Unit II (EQT 1080).

# Process/Pollutant Information

**PROCESS NAME:** ETO 4 & ETO 5 HH Loop Reactors (EQT 1151 & 1152)

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vents through a closed vent system to the ETO/Guerbet

Elevated Flare (EQT 1079) or to ETO/Guerbet Vapor Combustion Unit II (EQT 1080).

# Facility Information

RBLC ID: LA-0301 (final) Date Determination

Last Updated:

04/28/2017

Corporate/Company Name: SASOL CHEMICALS (USA) LLC Permit Number: PSD-LA-779

Facility Name: LAKE CHARLES CHEMICAL COMPLEX ETHYLENE 2 UNIT Permit Date: 05/23/2014 (actual)

Facility Contact: ERIC RODRIGUEZ (281) 588-3761 ERIC.RODRIGUEZ@US.SASOL.COM FRS Number: 110017418061

Facility Description: SIC Code: 2869

**Permit Type:** B: Add new process to existing facility **NAICS Code:** 325110

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

**Facility County:** CALCASIEU

Facility State: LA

Facility ZIP Code: 70669

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Permit Notes:** Complete application date = date of administrative completeness This RBLC entry addresses Ethylene Unit 2 of the Lake Charles

Cracker Project. This unit will produce ethylene by thermally cracking ethane in cracking furnaces.

#### Process/Pollutant Information

**PROCESS NAME:** Utility Steam Boiler Nos. 1-3 (EQTs 967, 968, & 969)

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** Process Gas

**Throughput:** 662.00 MM BTU/HR

**Process Notes:** Boilers are subject to 40 CFR 60 Subpart Db and 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 5 & 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 5.0200 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 52.8700 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU AVERAGE OF THREE 1-HOUR TEST RUNS Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate PM10 limit for all 3 boilers. Good combustion practices shall include

monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a

range that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 5 & 202

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 5.0200 LB/HR HOURLY MAXIMUM Emission Limit 2: 52.8700 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU AVERAGE OF THREE 1-HOUR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate PM2.5 limit for all 3 boilers. Good combustion practices shall include

monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a

range that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 1.9800 LB/HR HOURLY MAXIMUM Emission Limit 2: 10.4300 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 grains per standard cubic foot (annual

average)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate SO2 limit for all 3 boilers.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Other
Other Test Method: CEMS

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 33.7000 LB/HR HOURLY MAXIMUM Emission Limit 2: 70.9600 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0100 LB/MMBTU 30-DAY ROLLING AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (B) Selective catalytic reduction (SCR) and ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: \*TPY value represents aggregate NOx limit for all 3 boilers. During startup events, the SCR catalyst must be at

the proper operating temperature before ammonia can be injected into the flue gas. Further, the SCR vendor has estimated that the ammonia distribution system may be down for up to 32 hours per year for maintenance. During these periods (i.e., startup/shutdown/maintenance), which may total up to 168 hours per year, NOx

emissions shall be limited to 0.05 lb/MM Btu (3-hour average).

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 23.5900 LB/HR HOURLY MAXIMUM Emission Limit 2: 248.3500 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0350 LB/MMBTU AVERAGE OF THREE 1-HOUR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: \*TPY value represents aggregate CO limit for all 3 boilers. Good combustion practices shall include monitoring

of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range

that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s):( Volatile Organic Compounds (VOC) )Emission Limit 1:3.6300 LB/HR HOURLY MAXIMUMEmission Limit 2:38.2600 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate VOC limit for all 3 boilers. Good combustion practices shall include

monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a

range that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 836405.0000 TPY\* ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: \*TPY value represents aggregate CO2e limit for all 3 boilers. Good combustion practices shall entail air

preparation, as appropriate (to minimize reduced performance caused by dust and debris in the intake air supply); use of service appropriate refractory materials; proper insulation of equipment and piping to minimize heat loss; use of heat exchangers to heat incoming combustion air or boiler feed water, produce steam, etc.; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with LDEQ's BACT determination for CO and VOC emissions; and compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration. The O&M plan shall include provisions to address the temporary removal of equipment from service during normal operations for maintenance and inspections. Good combustion practices shall also include a condensate return system (to return condensate to the boiler feed water system); recovery of waste heat from boiler blowdown; and preheating and treatment of boiler feed water. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall

be revised accordingly without the need to modify the permit.

# Process/Pollutant Information

**PROCESS NAME:** Furnace Nos. 1-8 (EQTs 971, 972, 973, 974, 975, 976, 977, & 978)

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 654.00 MM BTU/HR

**Process Notes:** The furnaces are subject to 40 CFR 60 Subparts NNN & RRR and 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 5 & 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 4.2700 LB/HR HOURLY MAXIMUM Emission Limit 2: 136.7900 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 0.0070 LB/MMBTU AVERAGE OF THREE 1-HOUR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate PM10 limit for all 8 furnaces. During decoking operations, decoking vents

shall be recycled to the fuel gas header, and PM10 emissions shall be limited to 0.03 lb/MM Btu (3-hour average). Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air

flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the

manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper

operation of the emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM
Test Method: Other

Other Test Method: Methods 5 & 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 4.2700 LB/HR HOURLY MAXIMUM
Emission Limit 2: 136.7900 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0070 LB/MMBTU AVERAGE OF THREE 1-HOUR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate PM2.5 limit for all 8 furnaces. During decoking operations, decoking vents

shall be recycled to the fuel gas header, and PM2.5 emissions shall be limited to 0.03 lb/MM Btu (3-hour average). Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the

manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper

operation of the emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 1.9200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 28.0800 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 grains per standard cubic foot (annual

average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate SO2 limit for all 8 furnaces.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Other
Other Test Method: CEMS

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 61.0100 LB/HR HOURLY MAXIMUM Emission Limit 2: 455.4700 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 0.0200 LB/MMBTU 30-DAY ROLLING AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) Selective catalytic reduction (SCR) and ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate NOx limit for all 8 furnaces. During startup events, the SCR catalyst must be

at the proper operating temperature before ammonia can be injected into the flue gas. Further, the SCR vendor has estimated that the ammonia distribution system may be down for up to 32 hours per year for maintenance. During these periods (i.e., startup/shutdown/maintenance), which may total up to 425 hours per year, NOx emissions shall be limited to 0.10 lb/MM Btu (3-hour average). During decoking operations, NOx shall be limited to 0.18 lb/MM Btu (3-hour average). During such periods, the firing rate is significantly reduced – 128.6

MM Btu/hr versus 545 MM Btu/hr during normal operations.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 21.3500 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 673.1200 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU AVERAGE OF THREE 1-HOUR TEST RUNS

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate CO limit for all 8 furnaces. Good combustion practices shall include

monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a

range that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 4.9100 LB/HR HOURLY MAXIMUM

Emission Limit 2: 153.7300 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0080 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \*TPY value represents aggregate VOC limit for all 8 furnaces. Good combustion practices shall include

monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a

range that is otherwise indicative of proper operation of the emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 2273111.0000 TPY\* ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

#### **Pollutant/Compliance Notes:**

\*TPY value represents aggregate CO2e limit for all 8 furnaces. Good combustion practices shall entail air preparation, as appropriate (to minimize reduced performance caused by dust and debris in the intake air supply); use of service appropriate refractory materials; proper insulation of equipment and piping to minimize heat loss; use of heat exchangers to heat incoming combustion air or boiler feed water, produce steam, etc.; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with LDEQ's BACT determination for CO and VOC emissions; and compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration. The O&M plan shall include provisions to address the temporary removal of equipment from service during normal operations for maintenance and inspections. Good combustion practices (during normal operations) shall also include recovery of refrigeration capacity from the incoming ethane feed; combustion of available hydrogen-rich off gas as fuel; and minimizing coke formation through proper design and operation. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Thermal Oxidizer (EQT 980)

**Process Type:** 19.200 (Emission Control Afterburners & Incinerators (combustion gasses only))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.6400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature

monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.6400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature

monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature

monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.2900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 6.6800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature

monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 12.4500 LB/HR HOURLY MAXIMUM Emission Limit 2: 36.3600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature

monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 17.7700 LB/HR HOURLY MAXIMUM

Emission Limit 2: 14.9500 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature

monitoring requirements of 40 CFR 63.988.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 3739.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart SS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the

closed vent system requirements of 40 CFR 63.983 and the operating, performance testing, and temperature monitoring requirements of 40 CFR 63.988. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised

accordingly without the need to modify the permit.

# Process/Pollutant Information

**PROCESS NAME:** Elevated Flare (EQT 981)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 562.2300 LB/HR HOURLY MAXIMUM Emission Limit 2: 30.5600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 562.2300 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 30.5600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 8.9600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.9700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 12383.1300 LB/HR HOURLY MAXIMUM Emission Limit 2: 22.6200 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 67378.7800 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 123.0800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 45046.7600 LB/HR HOURLY MAXIMUM

**Emission Limit 2:** 59.9200 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 44516.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is

revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Ground Flare (EQT 982)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1041.9400 LB/HR HOURLY MAXIMUM

**Emission Limit 2:** 9.5600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Particulate matter, total < 2.5 µ (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1041.9400 LB/HR HOURLY MAXIMUM

**Emission Limit 2:** 9.5600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 803.8400 LB/HR HOURLY MAXIMUM Emission Limit 2: 9.5900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 8565.3100 LB/HR HOURLY MAXIMUM Emission Limit 2: 80.8400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 46605.3800 LB/HR HOURLY MAXIMUM Emission Limit 2: 440.0200 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 24759.7400 LB/HR HOURLY MAXIMUM

Emission Limit 2: 162.8300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for

steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 100085.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to

Sasol's SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use

of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is

## Process/Pollutant Information

PROCESS NAME: Firewater Pump Nos. 1-3 (EQTs 997, 998, & 999)

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: Diesel

**Throughput:** 500.00 HP

**Process Notes:** Non-emergency use operating time is limited to 100 hr/yr (per engine).

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.1700 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0100 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.1500 G/BHP-HR

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the limitations imposed by 40 CFR 60 Subpart IIII and its

associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to

maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1700 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.0100 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.1500 G/BHP-HR

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the limitations imposed by 40 CFR 60 Subpart IIII and its

associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to

maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0050 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0010 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Sulfur content of fuel is limited to 15 ppm. Annual SO2 limit is represented as "

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 3.2100 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.1600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NOx + NMHC emissions are limited to 3.0 g/hp-hr. BACT is determined to be compliance with the limitations

imposed by 40 CFR 60 Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures

(consistent with safe operation) designed to maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1:2.8700 LB/HR HOURLY MAXIMUMEmission Limit 2:0.1400 TPY ANNUAL MAXIMUM

**Standard Emission:** 2.6000 G/BHP-HR

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the limitations imposed by 40 CFR 60 Subpart IIII and its

associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to

maximize combustion efficiency and minimize fuel usage.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1000 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0050 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NOx + NMHC emissions are limited to 3.0 g/hp-hr. BACT is determined to be compliance with the limitations

imposed by 40 CFR 60 Subpart IIII and its associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize combustion efficiency and minimize fuel usage.

(consistent with safe operation) designed to maximize combustion efficiency and minimize ruer us

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 10.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII and operating the engine in accordance with the engine

manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize

combustion efficiency and minimize fuel usage

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the limitations imposed by 40 CFR 60 Subpart IIII and its

associated monitoring, recordkeeping, and reporting requirements; and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures (consistent with safe operation) designed to maximize combustion efficiency and minimize fuel usage. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be

revised accordingly without the need to modify the permit.

## Process/Pollutant Information

**PROCESS NAME:** Steam Fugitive Emissions (FUG 17)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 88.1400 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): LAC 33:III.2122

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Cooling Tower (EQT 979)

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 358000.00 GALS/MIN

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 20.4700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\mbox{MACT}$  ,  $\mbox{OPERATING PERMIT}$ 

Control Method: (P) High efficiency drift eliminators and low TDS cooling water

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Determine and record the concentration of total dissolved solids (TDS) in the cooling water at least once per

week using Standard Method 2540C or EPA Method 160.1. The efficiency of the drift eliminators shall be verified by the manufacturer's certification. The permittee shall average all recorded TDS concentrations and utilize the manufacturer's drift rate and the design recirculation rate of the cooling water pump(s) to determine

compliance with the permit's emissions limitations.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 20.4700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) High efficiency drift eliminators and low TDS cooling water

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Determine and record the concentration of total dissolved solids (TDS) in the cooling water at least once per

week using Standard Method 2540C or EPA Method 160.1. The efficiency of the drift eliminators shall be verified by the manufacturer's certification. The permittee shall average all recorded TDS concentrations and utilize the manufacturer's drift rate and the design recirculation rate of the cooling water pump(s) to determine

compliance with the permit's emissions limitations.

## Process/Pollutant Information

**PROCESS NAME:** Process Wastewater Treatment Plant (FUG 18)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

**Throughput:** 12647.00 GALS/MIN

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 40.0100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63 Subpart G and 40 CFR 61 Subpart FF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The wastewater treatment plant will receive Group 2 wastewater streams from multiple process units.

# Process/Pollutant Information

**PROCESS NAME:** Railcar Loading (EQT 983)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 206.60 MM GALS/YR

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 18.9700 LB/HR HOURLY MAXIMUM
Emission Limit 2: 40.8300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

**Control Method:** (A) Thermal oxidation

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing VOC emissions through a closed vent system to a thermal oxidizer. No

further control is required for the loading of sulfide/spent caustic with a floating layer of oil, as VOC emissions

from this activity total only 0.03 TPY.

#### Process/Pollutant Information

**PROCESS NAME:** Fugitive Emissions (FUG 19)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 90.3100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\operatorname{NSPS}$  ,  $\operatorname{MACT}$  ,  $\operatorname{SIP}$  ,  $\operatorname{OPERATING}$  PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 63 Subpart UU

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Methanol/Propanol Storage Tank (EQT 984)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 58824.00 GALS/YR

**Process Notes:** Tank volume = 216,583 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\operatorname{MACT}$  ,  $\operatorname{SIP}$  ,  $\operatorname{OPERATING}$  PERMIT

Control Method: (P) Internal Floating Roof

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Sulfuric Acid Storage Tank (EQT 985)

**Process Type:** 62.020 (Inorganic Liquid/Gas Storage & Handling)

**Primary Fuel:** 

**Throughput:** 730531.00 GALS/YR

**Process Notes:** Tank volume = 33,809 gallons

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** PSD permit represents SO2 limit as "

#### Process/Pollutant Information

**PROCESS NAME:** Methanol Storage Tank (EQT 986)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 15000.00 GALS/YR

**Process Notes:** Tank volume = 5000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

**Control Method:** (P) Internal Floating Roof

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS NAME: Process Water Tanks (EQTs 987, 988, & 989)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

**Throughput:** 730531.00 GALS/YR

**Process Notes:** Throughput = per tank Tank volume = 1.09 million gallons each

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 17.8200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, MACT, OPERATING PERMIT

**Control Method:** (P) Internal Floating Roof

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

### Process/Pollutant Information

**PROCESS NAME:** Sulfide Caustic Storage Tanks (EQTs 990, 991, & 992)

**Process Type:** 62.020 (Inorganic Liquid/Gas Storage & Handling)

**Primary Fuel:** 

**Throughput:** 4.45 MM GALS/YR

**Process Notes:** Throughput = per tank Tank volume = 133,643 gallons each

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT
Control Method: (P) Internal Floating Roof

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

# Process/Pollutant Information

**PROCESS NAME:** Wash Oil Tank (EQT 993)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 393176.00 GALS/YR

**Process Notes:** Tank volume = 60,319 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Internal Floating Roof

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Benzene Stripper (EQT 1135)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, MACT, OPERATING PERMIT Control Method: (P) Route emissions to the fuel gas system

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** Wastewater Drums and Sumps

NAME:

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: Includes the following sources: Caustic Drain Drum (ETH2-95-D-330, EQT 1137) Spent Caustic Flash Drum (ETH2-95-D-331, EQT 1138) Cracked

Gas Compressor Oily WWTR Sump (ETH2-M7-9703, EQT 1139) Refrig Compressor Oily Wastewater Sump (ETH2-M8-9704, EQT 1140) Quench

Water Oily Wastewater Sump (ETH2-M9-9702, EQT 1141) Caustic Wastewater Sump (ETH2-M10-9705, EQT 1142)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above drums and sumps through a closed vent system to the Ground Flare

(EQT 0982).

#### Process/Pollutant Information

**PROCESS NAME:** Benzene Accumulator (EQT 1143)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to the Elevated Flare

(EQT 0981).

# Process/Pollutant Information

**PROCESS** Pressurized Tanks

NAME:

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

Process Notes: Includes the following sources: Propylene Refrigerant Tank (ETH2-D92-9050, EQT 1106) P&P (Propane & Propylene) Tank (ETH2-D92-9051, EQT

1107) Butadiene Tank (ETH2-D92-9052A, EQT 1108) Butadiene Tank (ETH2-D92-9052B, EQT 1109) Co-Product Tank (ETH2-D92-9057, EQT

1112) Propionaldehyde Drum (ETH2-D92-9060, EQT 1114) Ethane Drum (ETH2-TK-1106, EQT 1115)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, SIP

Control Method: (P) Maintain the working pressure sufficient at all times under normal operating conditions to prevent vapor or

gas loss to the atmosphere

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: LAC Tank (EQT 1110), Heavy Pygas (HAD) Tank (EQT 1111), and Pentane Drum (EQT 1113)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above storage vessels through a closed vent system to the Elevated Flare

(EQT 0981), Ground Flare (EQT 0982), or to an equivalent flare.

#### Process/Pollutant Information

**PROCESS NAME:** Wash Oil Tank (EQT 1116) and Dimethyl Sulfide Tank (EQT 1117)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Wash Oil Tank (EQT 1116) = 5000 gallons Dimethyl Sulfide Tank (EQT 1117) = 10,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above storage vessels through a closed vent system to the Elevated Flare

(EQT 0981), Ground Flare (EQT 0982), or to an equivalent flare.

#### Process/Pollutant Information

**PROCESS NAME:** Sulfide Caustic Oxidation (EQT 1136)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NESHAP, MACT, OPERATING PERMIT

**Control Method:** (A) Thermal Oxidizer

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to Thermal Oxidizer

Z85-8657 (EQT 0980).

#### Process/Pollutant Information

**PROCESS NAME:** C3 Hydrogenation Package (EQT 1127)

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare (or route emissions to the fuel gas system)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to the Ground Flare or to

the fuel gas system.

#### Process/Pollutant Information

**PROCESS** Distillation Units

NAME:

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

Process Notes: Includes the following sources: Demethanizer (ETH2-T-401, EQT 1130) Deethanizer (ETH2-T-501, EQT 1131) Depropanizer (ETH2-T-601, EQT

1133) Debutanizer (ETH2-T-651, EQT 1134)

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Route emissions to the fuel gas system

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Sour Water Stripper (EQT 1128)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput:

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\ensuremath{\mathsf{NESHAP}}$  ,  $\ensuremath{\mathsf{MACT}}$  ,  $\ensuremath{\mathsf{OPERATING}}$  PERMIT

**Control Method:** (P) Route emissions to the fuel gas system

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Caustic Wash Tower (EQT 1129) and Water Wash Tower (EQT 1132)

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Route emissions to the fuel gas system

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** C2 Hydrogenation Reactor (EQT 1126)

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vents through a closed vent system to the Ground Flare

(EQT 0982).

# Process/Pollutant Information

**PROCESS** Process Vents

NAME:

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

Process Notes: Includes the following sources: Analyzers (ETH2-Ana, EQT 1121) H2 Dryer Switch (ETH2-H2DS, EQT 1122) Frac Feed Dryer (ETH2-FFD, EQT

1123) Propylene from VCM (ETH2-PVCM, EQT 1124) Startup Converter (ETH2-SC, EQT 1125)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vents through a closed vent system to the Ground Flare

(EQT 0982).

## Process/Pollutant Information

**PROCESS** Loading Operations

NAME:

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 0

Process Notes: Includes the following sources: Propylene Refrig Unloading Line (ETH2-PRUL, EQT 1118) PSL Loading Rack (ETH2-PSLLR, EQT 1119) PSL

Railcar Samples (ETH2-PSLRS, EQT 1120)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollution technology considerations influence the BACT decisions: U

**Case-by-Case Basis: BACT-PSD** 

Other Applicable Requirements: MACT, SIP, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vents through a closed vent system to the Ground Flare

(EQT 0982).

# **Facility Information**

**RBLC ID: Date Determination** LA-0302 (final)

04/28/2017 Last Updated:

SASOL CHEMICALS (USA) LLC **Corporate/Company Name:** 

**Permit Number:** PSD-LA-779

**Facility Name:** LAKE CHARLES CHEMICAL COMPLEX EO/MEG UNIT **Permit Date:** 05/23/2014 (actual)

**Facility Contact:** ERIC RODRIGUEZ (281) 588-3761 ERIC.RODRIGUEZ@US.SASOL.COM

> SIC Code: 2869

**Permit Type:** B: Add new process to existing facility **NAICS Code:** 325199

**Permit URL:** 

**Facility Description:** 

**EPA Region:** 6 **COUNTRY:** 

FRS Number:

**USA** 

110017418061

**Facility County: CALCASIEU** 

**Facility State:** LA **Facility ZIP Code:** 70669

**Permit Issued By:** LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Permit Notes:** Complete application date = date of administrative completeness This RBLC entry addresses the Ethylene Oxide/Monoethylene Glycol

(EO/MEG) Unit of the Lake Charles Cracker Project.

#### Process/Pollutant Information

**PROCESS NAME:** Process Heat Boilers B-910A & B-910B (EOTs 1008 & 1009)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures) Primary Fuel: Process Gas

**Throughput:** 78.00 MM BTU/HR

**Process Notes:** Heat input = per boiler

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1:0.5800 LB/HR HOURLY MAXIMUMEmission Limit 2:1.8700 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour PM10 limitations are per boiler. \*Annual PM10 emissions from both boilers are limited to the

TPY value reported. Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper

operation of the emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.8700 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Pound per hour PM2.5 limitations are per boiler. \*Annual PM2.5 emissions from both boilers are limited to the

TPY value reported. Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper

operation of the emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 4.6000 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.3700 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels with a sulfur content of no more than 0.005 grains per standard cubic foot (gr/scf)

(annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Pound per hour SO2 limitations are per boiler. \*Annual SO2 emissions from both boilers are limited to the TPY

value reported.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.9700 LB/HR HOURLY MAXIMUM
Emission Limit 2: 9.5500 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour NOx limitations are per boiler. \*Annual NOx emissions from both boilers are limited to the TPY

value reported.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1:2.7400 LB/HR HOURLY MAXIMUMEmission Limit 2:8.8000 TPY\* ANNUAL MAXIMUM

Standard Emission: 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour CO limitations are per boiler. \*Annual CO emissions from both boilers are limited to the TPY

value reported. Good combustion practices shall include monitoring of the flue gas oxygen content, combustion

air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper

operation of the emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 69173.0000 TPY\* ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** \*Annual CO2e emissions from both boilers are limited to the TPY value reported. Good combustion practices

shall entail air preparation, as appropriate (to minimize reduced performance caused by dust and debris in the intake air supply); use of service appropriate refractory materials; proper insulation of equipment and piping to minimize heat loss; use of heat exchangers to heat incoming combustion air or boiler feed water, produce steam, etc.; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups consistent with LDEQ's BACT determination for CO and VOC emissions; and compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of boiler tubes and heat exchangers and measures to minimize air infiltration. The O&M plan shall include provisions to address the temporary removal of equipment from service

during normal operations for maintenance and inspections. Good combustion practices shall also include a condensate return system (to return condensate to the boiler feed water system); recovery of waste heat from boiler blowdown; and preheating and treatment of boiler feed water. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall

be revised accordingly without the need to modify the permit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.4200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.3600 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour VOC limitations are per boiler. \*Annual VOC emissions from both boilers are limited to the

TPY value reported. Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper

operation of the emissions unit.

#### Process/Pollutant Information

**PROCESS NAME:** Elevated Flare and Ground Flare (EQTs 1012 & 1013)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** Normal operating rate = 79,370 lb/hr

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.1800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1600 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Pound per hour PM10 limitations are per flare. \*Annual PM10 emissions from both flares are limited to the TPY

value reported.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.1800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1600 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour PM2.5 limitations are per flare. \*Annual PM2.5 emissions from both flares are limited to the

TPY value reported.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0200 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour SO2 limitations are per flare. \*Annual SO2 emissions from both flares are limited to the TPY

value reported.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.4300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.0600 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour NOx limitations are per flare. \*Annual NOx emissions from both flares are limited to the TPY

value reported.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 13.2300 LB/HR HOURLY MAXIMUM Emission Limit 2: 5.7900 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour CO limitations are per flare. \*Annual CO emissions from both flares are limited to the TPY

value reported.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 1998.0000 TPY\* ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** \*Annual CO2e emissions from both flares are limited to the TPY value reported. The CO2e limits are based on

a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the

CO2e limits shall be revised accordingly without the need to modify the permit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 278.1300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 2.3500 TPY\* ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.148;

minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas

as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Pound per hour VOC limitations are per flare. \*Annual VOC emissions from both flares are limited to the TPY

value reported.

# Process/Pollutant Information

**PROCESS NAME:** E-222 Regenerator Condenser CO2 Vent (EQT 1010)

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.1300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.3400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 8.0200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 5.1500 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, OPERATING PERMIT

Control Method: (P) Compliance with the applicable provisions of 40 CFR 63 Subpart G for Group 2 process vents

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 215473.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Selection of a catalyst that maximizes production of EO over the by-products of CO2 and water to limit

CO2e emissions to the hourly and annual rates set forth in the PSD permit

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the

event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

### Process/Pollutant Information

**PROCESS NAME:** Cooling Tower (EQT 1011)

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 156000.00 GALS/MIN

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.7100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) High efficiency drift eliminators and low TDS cooling water

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall determine and record the concentration of total dissolved solids (TDS) in the cooling water

at least once per week using Standard Method 2540C or EPA Method 160.1. The efficiency of the drift eliminators shall be verified by the manufacturer's certification. The permittee shall average all recorded TDS concentrations and utilize the manufacturer's drift rate and the design recirculation rate of the cooling water

pump(s) to determine compliance with emissions limitations.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.7100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) High efficiency drift eliminators and low TDS cooling water

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The permittee shall determine and record the concentration of total dissolved solids (TDS) in the cooling water

at least once per week using Standard Method 2540C or EPA Method 160.1. The efficiency of the drift eliminators shall be verified by the manufacturer's certification. The permittee shall average all recorded TDS concentrations and utilize the manufacturer's drift rate and the design recirculation rate of the cooling water

pump(s) to determine compliance with emissions limitations.

## Process/Pollutant Information

**PROCESS NAME:** Fugitive Emissions (FUG 20)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 26.5100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, SIP, OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 63 Subpart H

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 204.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 63 Subpart H

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the

event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Railcar Loading (EQT 1014)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 883.60 MM GALS/YR

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 27.9600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 2.2800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Best maintenance practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Group 2 transfer rack per 40 CFR 63 Subpart G

## Process/Pollutant Information

PROCESS NAME: MEG Storage Tanks (EQTs 1015, 1016, & 1017)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 181.44 MM GALS/YR

**Process Notes:** Tank capacity = 3.86 MM gallons each Throughput = per tank

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessels (Group 2 under 40 CFR 63 Subpart G) VOC emission limits are per tank.

### Process/Pollutant Information

**PROCESS NAME:** DEG Storage Tanks (EQTs 1018 & 1019)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 14.97 MM GALS/YR

**Process Notes:** Tank capacity = 454,000 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessels (Group 2 under 40 CFR 63 Subpart G) VOC emission limits are per tank.

### Process/Pollutant Information

**PROCESS NAME:** TEG Storage Tanks (EQTs 1020 & 1021)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 792000.00 GALS/YR

**Process Notes:** Tank capacity = 24,000 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessels (Group 2 under 40 CFR 63 Subpart G) VOC emission limits are per tank.

## Process/Pollutant Information

**PROCESS NAME:** DEG Storage Tank (EQT 1022)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 14.97 MM GALS/YR

**Process Notes:** Tank capacity = 136,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessel (Group 2 under 40 CFR 63 Subpart G)

## Process/Pollutant Information

**PROCESS NAME:** Crude Glycol Storage Tank (EQT 1023)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 181.44 MM GALS/YR

**Process Notes:** Tank capacity = 976,527 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.4000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessel (Group 2 under 40 CFR 63 Subpart G)

### Process/Pollutant Information

**PROCESS NAME:** Crude Heavy Glycol Storage Tank (EQT 1024)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 16.11 MM GALS/YR

**Process Notes:** Tank capacity = 77,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessel (Group 2 under 40 CFR 63 Subpart G)

#### Process/Pollutant Information

**PROCESS NAME:** PEG Storage Tank (EQT 1025)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 366000.00 GALS/YR

**Process Notes:** Tank capacity = 24,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: Fixed roof storage vessel (Group 2 under 40 CFR 63 Subpart G) Permit represents VOC limit as "

## Process/Pollutant Information

**PROCESS NAME:** MEG Rundown Storage Tanks (EQT 1026 & 1027)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 181.44 MM GALS/YR

**Process Notes:** Tank capacity = 629,000 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessels (Group 2 under 40 CFR 63 Subpart G) VOC emission limits are per tank.

#### Process/Pollutant Information

**PROCESS NAME:** DEG Rundown Storage Tanks (EQT 1028 & 1029)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 14.97 MM GALS/YR

**Process Notes:** Tank capacity = 107,234 gallons each Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0030 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessels (Group 2 under 40 CFR 63 Subpart G) VOC emission limits are per tank.

### Process/Pollutant Information

**PROCESS NAME:** TEG Rundown Storage Tanks (EQT 1030 & 1031)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 792000.00 GALS/YR

Process Notes: Tank capacities: EQT 1030 - 25,569 gallons EQT 1031 - 26,000 gallons Throughput = per tank

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** Fixed roof storage vessels (Group 2 under 40 CFR 63 Subpart G) VOC emission limits are per tank.

### Process/Pollutant Information

**PROCESS NAME:** Sulfuric Acid Storage Tank (EQT 1032)

**Process Type:** 62.020 (Inorganic Liquid/Gas Storage & Handling)

**Primary Fuel:** 

**Throughput:** 121700.00 GALS/YR

**Process Notes:** Tank capacity = 16,798 gallons

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Permit represents SO2 limit as "

# Process/Pollutant Information

**PROCESS** Heat Exchangers

NAME:

**Process** 64.999 (Other SOCMI Processes)

Type: Primary

**Fuel:** 

**Throughput:** 0

**Process** Includes the following sources: Wash Water Cooler (EOM-E-116, EQT 1056) Cycle Water Cooler (EOM-E-313, EQT 1057) Reclaim Compressor

Notes:

Aftercooler (EOM-E-320, EQT 1058) Reabsorber Bottom Coolers (EOM-E-322A/B/C, EQT 1059) Reabsorber Water Coolers (EOM-E-321A/B, EQT 1060) Purification Column Condenser (EOM-E-411, EQT 1061) Vacuum Effect Condenser (EOM-E-538, EQT 1062) Wastewater VOC Stripper Bottoms Cooler (EOM-E-570, EQT 1063) Drying Column Condenser (EOM-E-611, EQT 1064) Crude Glycol Tank Feed Cooler (EOM-E-615, EQT 1065) MEG Column Ejector Precondenser (EOM-E-623, EQT 1066) DEG Column Condenser (EOM-E-711, EQT 1067) Crude Heavy Glycol Cooler (EOM-E-715, EQT 1068) TEG Column Condenser (EOM-E-721, EQT 1069) TEG Product Cooler (EOM-E-722, EQT 1070) Blowdown Cooler (EOM-E-940, EQT 1071) Cycle Water Bleed Exchanger (EOM-E-552, EQT 1073) Cycle Water Bleed Cooler (EOM-E-553, EQT 1074) MEG Splitter Condenser (EOM-E-631, EQT 1278)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Compliance with the heat exchange system requirements of 40 CFR 63.104

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the heat exchange system requirements of 40 CFR 63.104

(regardless if it is otherwise applicable). These provisions require Sasol to monitor the cooling water for the presence of one or more organic hazardous air pollutants or other representative substances whose presence in cooling water indicates a leak, repair any leaks that are detected, and confirm that the heat exchange system is no

longer leaking following repair activities. This section also prescribes recordkeeping and reporting

requirements.

**PROCESS NAME:** Glycol Sump (EQT 1075)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: BACT is determined to be routing the above sump through a closed vent system to the Elevated Flare (EQT

1012) or to the Ground Flare (EQT 1013).

## Process/Pollutant Information

**PROCESS NAME:** Cycle Water Treating Unit (EQT 1076)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

POLLUTANT NAME: Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Combustion (Flare or Process Heat Boiler)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above vent through a closed vent system to the Elevated Flare (EQT

1012), to the Ground Flare (EQT 1013), to Process Heat Boiler B-910A (EQT 1008), or to Process Heat Boiler

B-910B (EQT 1009).

### Process/Pollutant Information

**PROCESS NAME:** Wastewater VOC Stripper (Vent) (EQT 1072)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Combustion (Process Heat Boiler)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above vent through a closed vent system to Process Heat Boiler B-910A

(EQT 1008) or to Process Heat Boiler B-910B (EQT 1009).

### Process/Pollutant Information

**PROCESS NAME:** EOM Storage Sphere (EQT 1078)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

**Control Method:** (P) Maintain the working pressure sufficient at all times under normal operating conditions to prevent vapor or

gas loss to the atmosphere

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** Process Vents

NAME:

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

Process Notes: Includes the following sources: Evaporator Vent (EOM-F-536, RLP 0122) Drying Column Hotwell (Vent) (EOM-F-610, RLP 0123) DEQ/TEG

Columns Hotwell (Vent) (EOM-F-710, RLP 0124) Waste Heat Boiler Pot (Vent) EOM-D-910A/B, RLP 0125)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (A) Combustion (Process Heat Boiler)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: BACT is determined to be routing the above process vents through a closed vent system to Process Heat Boiler

B-910A (EQT 1008) or to Process Heat Boiler B-910B (EQT 1009).

# Process/Pollutant Information

**PROCESS** Process Vents

NAME:

**Process** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

Type: Primary

**Fuel:** 

Throughput: 0

Process Includes the following sources: Reactor/Gas Cooler (EOM-R-110, EQT 1034) Sulfur Guard Bed (EOM-R-150, EQT 1035) Glycol Reactor

Notes: (EOM-R-250, EQT 1036) Regenerator/Feed Flash Drums (EOM-T-220, EQT 1038) Stripping Column/Flash Drum (EOM-T-310, EQT 1039)

Reabsorber (EOM-T-320, EQT 1040) Vent Scrubber (EOM-T-330, EQT 1041) Purification Column (EOM-T-410, EQT 1042) Glycol Feed Stripper (EOM-T-510, EQT 1043) First Effect Evaporator (EOM-T-531, EQT 1044) Second Effect Evaporator (EOM-T-532, EQT 1045) Third Effect Evaporator (EOM-T-533, EQT 1046) Fourth Effect Evaporator (EOM-T-534, EQT 1047) Fifth Effect Evaporator (EOM-T-535, EQT 1048) Six Effect Evaporator (EOM-T-536, EQT 1049) Vacuum Effect Evaporator (EOM-T-537, EQT 1050) Aldehyde Stripper (EOM-T-560, EQT 1051) Drying Column

(EOM-T-610, EQT 1052) MEG Splitter (EOM-T-630, EQT 1053) DEG Column (EOM-T-710, EQT 1054) TEG Column (EOM-T-720, EQT 1055)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vents through a closed vent system to the Elevated Flare

(EQT 1012) or to the Ground Flare (EQT 1013).

# Facility Information

RBLC ID: LA-0303 (final) Date Determination

**Last Updated:** 04/28/2017

Corporate/Company Name: SASOL CHEMICALS (USA) LLC Permit Number: PSD-LA-779

Facility Name: LAKE CHARLES CHEMICAL COMPLEX ZIEGLER ALCOHOL UNIT Permit Date: 05/23/2014 (actual)

Facility Contact: ERIC RODRIGUEZ (281) 588-3761 ERIC.RODRIGUEZ@US.SASOL.COM FRS Number: 110017418061

Facility Description: SIC Code: 2869

**Permit Type:** D: Both B (Add new process to existing facility) &C (Modify process at existing NAICS Code: 325199

facility)

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: CALCASIEU

Facility State: LA

Facility ZIP Code: 70669

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

**Permit Notes:** Complete application date = date of administrative completeness This RBLC entry addresses the expansion of the existing Alcohol Unit,

part of the Lake Charles Cracker Project. The new process train will produce highly linear primary alcohols ranging from 2 to about 28

carbons using Ziegler technology.

#### Process/Pollutant Information

**PROCESS NAME:** Reactor Feed Heater (EQT 1160)

**Process Type:** 13.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 18.00 MM BTU/HR

**Process Notes:** Heater is subject to 40 CFR 60 Subpart Dc and 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1300 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.4900 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.1300 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.4900 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 1.0600 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.1000 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels with a sulfur content of no more than 0.005 grains per standard cubic foot (gr/scf)

(annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.6800 LB/HR HOURLY MAXIMUM
Emission Limit 2: 2.5000 TPY ANNUAL MAXIMUM

Standard Emission: 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.6300 LB/HR HOURLY MAXIMUM

Emission Limit 2: 2.3000 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.1000 LB/HR HOURLY MAXIMUM

Emission Limit 2: 0.3500 TPY ANNUAL MAXIMUM

Standard Emission: 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 9484.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail air preparation, as appropriate (to minimize reduced performance caused

by dust and debris in the intake air supply); use of service appropriate refractory materials; proper insulation of

equipment and piping to minimize heat loss; use of heat exchangers to heat incoming combustion air;

instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups; and compliance with a written operations and maintenance (O&M) plan

developed by Sasol that addresses topics such as the inspection and cleaning of heat exchangers and measures to minimize air infiltration. The O&M plan shall also include provisions to address the temporary removal of equipment from service during normal operations for maintenance and inspections. Flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

## Process/Pollutant Information

**PROCESS NAME:** Hot Oil Heater (EQT 1161)

**Process Type:** 12.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: Process Gas

**Throughput:** 240.00 MM BTU/HR

**Process Notes:** Heater is subject to 40 CFR 60 Subpart Db and 40 CFR 63 Subpart DDDDD.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.7900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 6.5300 TPY ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 1.7900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 6.5300 TPY ANNUAL MAXIMUM

Standard Emission: 0.0075 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 14.1200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.2900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Use of gaseous fuels with a sulfur content of no more than 0.005 grains per standard cubic foot (gr/scf)

(annual average)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 9.1200 LB/HR HOURLY MAXIMUM Emission Limit 2: 33.2900 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0380 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

Control Method: (P) Ultra low NOx burners (ULNB)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 8.4000 LB/HR HOURLY MAXIMUM
Emission Limit 2: 30.6600 TPY ANNUAL MAXIMUM

**Standard Emission:** 0.0350 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.2900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 4.7200 TPY ANNUAL MAXIMUM

Standard Emission: 0.0054 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Good combustion practices and compliance with the applicable provisions of 40 CFR 63 Subpart DDDDD

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall include monitoring of the flue gas oxygen content, combustion air flow, fuel

consumption, and flue gas temperature. These parameters shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the

emissions unit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 145933.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Good combustion practices shall entail air preparation, as appropriate (to minimize reduced performance caused

by dust and debris in the intake air supply); use of service appropriate refractory materials; proper insulation of equipment and piping to minimize heat loss; use of heat exchangers to heat incoming combustion air; instrumentation to monitor the flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature; periodic tune-ups; and compliance with a written operations and maintenance (O&M) plan developed by Sasol that addresses topics such as the inspection and cleaning of heat exchangers and measures to minimize air infiltration. The O&M plan shall also include provisions to address the temporary removal of equipment from service during normal operations for maintenance and inspections. Flue gas oxygen content, combustion air flow, fuel consumption, and flue gas temperature shall be maintained within the manufacturer's recommended operating guidelines or within a range that is otherwise indicative of proper operation of the emissions unit. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to modify

the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Elevated Flare (EQT 133)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** Normal operating rate = 860.33 MM lb/yr

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.9000 LB/HR HOURLY MAXIMUM
Emission Limit 2: 1.4300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.9000 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 1.4300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.5100 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.4100 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 55.3200 LB/HR HOURLY MAXIMUM Emission Limit 2: 41.4200 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 300.9300 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 225.4000 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 420.6700 LB/HR HOURLY MAXIMUM

Emission Limit 2: 192.9900 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 94386.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to

modify the permit.

# Process/Pollutant Information

**PROCESS NAME:** Emission Combustion Unit #3 Ground Flare (EQT 500)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Normal operating rate = 860.33 MM lb/yr

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.5200 LB/HR HOURLY MAXIMUM Emission Limit 2: 0.4300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

 $\begin{tabular}{ll} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} & \textbf{U} \\ \end{tabular}$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.5200 LB/HR HOURLY MAXIMUM Emission Limit 2: 0.4300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Sulfur (SOx))

**Emission Limit 1:** 20.7900 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 0.1400 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 49.6800 LB/HR HOURLY MAXIMUM Emission Limit 2: 10.7800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 270.3200 LB/HR HOURLY MAXIMUM **Emission Limit 2:** 58.6700 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

natural gas as pilot gas.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 566.9700 LB/HR HOURLY MAXIMUM

Emission Limit 2: 92.9800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 24567.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

natural gas as pilot gas.

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of

flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and

for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including,

but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complex's startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas. The CO2e limits are based on a CH4 global warming potential (GWP) of 21 and a N2O GWP of 310. In the event any GWP is revised, the CO2e limits shall be revised accordingly without the need to

modify the permit.

#### Process/Pollutant Information

**PROCESS NAME:** Melt Bin (EQT 1159)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 45500.00 GALS/YR **Process Notes:** Fixed roof container

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 85.2200 LB/HR HOURLY MAXIMUM
Emission Limit 2: 0.0600 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Fugitive Emissions (FUG 22)

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 21

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 308.4800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Leak Detection and Repair (LDAR): 40 CFR 63 Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Loading Rack Operations (EQT 1162)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 196500.00 GALS/HR

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2727.5900 LB/HR HOURLY MAXIMUM
Emission Limit 2: 22.2800 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Best maintenance practices consistent with Sasol's written plan developed pursuant to LAC 33:III.2113

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Isopropanol/Slurry Tank (EQT 1163)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Tank volume = 9988 gallons Group 2 storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.1000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Alcohol/Hydrolysis Condensate/Slurry Tanks (EQTs 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, & 1176)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** Tank volume = 21,000 gallons each Group 2 storage vessels under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.2500 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

#### Process/Pollutant Information

**PROCESS NAME:** SSO Storage Tank (EQT 139)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 35.00 MM GALS/YR

**Process Notes:** Tank volume = 127,092 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.0300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, SIP, OPERATING PERMIT

**Control Method:** (P) Internal floating roof

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 173)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 3.40 MM GALS/YR

**Process Notes:** Tank volume = 87,569 gallons Group 2 storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.2600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Internal floating roof

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Wastewater Collection and Transfer System (EQT 1203)

**Process Type:** 64.006 (Wastewater Collection & Treatment)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 4.1500 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) Compliance with the applicable provisions of 40 CFR 61 Subpart FF and 40 CFR 63.2485(j) of Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS** S-5500 Vent Knockout Drum (EQT 1206)

NAME:

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** The S-5500 Vent Knockout Drum functions as a recovery device for various process equipment located within the Alcohol Unit (i.e., Dehydrator

Tower ALC-DA-5501, Butanol Stripper Tower ALC-DA-5504, Ammonia Absorber Tower ALC-DA-5505, and Hydrolysis Reactor ALC-DC-5501).

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 20.4200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, MACT, OPERATING PERMIT

Control Method: (P) Maintain the TRE index value above 5.0 consistent with 40 CFR 63.2455(a) and Table 1 to Subpart FFFF

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Loading Rack (EQT 226)

**Process Type:** 64.005 (Transfer of SOCMI Chemicals (loading/unloading, filling, etc.))

**Primary Fuel:** 

**Throughput:** 2400000.00 LB/YR

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

Emission Limit 1: 1878.2200 LB/HR HOURLY MAXIMUM

**Emission Limit 2:** 8.4300 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OPERATING PERMIT

Control Method: (A) Carbon adsorption

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Growth Product Tanks (EQTs 1177 & 1180)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 124.51 MM GALS/YR

Process Notes: Tank volume = 235,000 gallons each Throughput = per tank Group 2 fixed roof storage vessels under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.9200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

# Process/Pollutant Information

**PROCESS NAME:** Growth Product Tanks (EQTs 1178 & 1179)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 126.55 MM GALS/YR

Process Notes: Tank volume = 241,000 gallons each Throughput = per tank Group 2 fixed roof storage vessels under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 4.5000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

#### Process/Pollutant Information

**PROCESS NAME:** Hydrolysis Water Storage Tank (EQT 1181)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 138.92 MM GALS/YR

**Process Notes:** Tank volume = 104,000 gallons Fixed roof storage vessel

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.8300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

# Process/Pollutant Information

**PROCESS NAME:** Wet Crude Alcohol Storage Tank (EQT 1182)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 291.16 MM GALS/YR

**Process Notes:** Tank volume = 288,000 gallons Fixed roof storage vessel

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 6.8100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

### Process/Pollutant Information

PROCESS NAME: HF 1000/LPA 140 Tank (EQT 1183)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 25.00 MM GALS/YR

**Process Notes:** Tank volume = 424,188 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.4000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** TPT/LPA 140 Tank (EQT 1184)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 170563.00 GALS/YR

**Process Notes:** Tank volume = 12,925 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0900 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** C6 Alc A & B Tanks (EQTs 1185 & 1186)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 21.00 MM GALS/YR

**Process Notes:** Tank volume = 763,486 gallons each Throughput = per tank Fixed roof storage vessels

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.4200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

### Process/Pollutant Information

**PROCESS NAME:** Light Pure Cut Tank (EQT 1187)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 25.00 MM GALS/YR

**Process Notes:** Tank volume = 42,301 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.4400 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

# Process/Pollutant Information

**PROCESS NAME:** C1214 Alcohol Tank (EQT 1188)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 12.90 MM GALS/YR

**Process Notes:** Tank volume = 1.7 million gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.4700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

## Process/Pollutant Information

**PROCESS NAME:** C8 Pure Cut Tank (EQT 1189)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 10.00 MM GALS/YR

**Process Notes:** Tank volume = 635,416 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

### Process/Pollutant Information

**PROCESS NAME:** C10 Pure Cut Tank (EQT 1190)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 11.00 MM GALS/YR

**Process Notes:** Tank volume = 635,416 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.6200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

 $\begin{tabular}{ll} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} & \textbf{U} \\ \end{tabular}$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

# Process/Pollutant Information

**PROCESS NAME:** C12 Pure Cut Tank (EQT 1191)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 8.00 MM GALS/YR

**Process Notes:** Tank volume = 635,416 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.2900 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10A

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

## Process/Pollutant Information

**PROCESS NAME:** C14 Pure Cut Tank (EQT 1192)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 5.00 MM GALS/YR

**Process Notes:** Tank volume = 1.26 million gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.3500 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

#### Process/Pollutant Information

**PROCESS NAME:** C16 Pure Cut Tank (EQT 1193)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 3.00 MM GALS/YR

**Process Notes:** Tank volume = 428,271 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.4000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

#### Process/Pollutant Information

**PROCESS NAME:** C18 Pure Cut Tank (EQT 1194)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 2.00 MM GALS/YR

**Process Notes:** Tank volume = 211,492 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.8500 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

#### Process/Pollutant Information

**PROCESS NAME:** C810 Alcohol Tank (EQT 1195)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 21.00 MM GALS/YR

**Process Notes:** Tank volume = 2.59 million gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.9000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\mbox{\sc OPERATING PERMIT}$  ,  $\mbox{\sc MACT}$ 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

#### Process/Pollutant Information

**PROCESS NAME:** C1214 Alcohol Tank (EQT 1196)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 13.20 MM GALS/YR

**Process Notes:** Tank volume = 1.7 million gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.5100 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

# Process/Pollutant Information

**PROCESS NAME:** C1618 Alcohol Tank (EQT 1197)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 6.40 MM GALS/YR

**Process Notes:** Tank volume = 845,968 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.8400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

# Process/Pollutant Information

**PROCESS NAME:** C20+ Alcohol Tank (EQT 1198)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 4.20 MM GALS/YR

**Process Notes:** Tank volume = 845,968 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.2400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:  $\mathsf{MACT}$  ,  $\mathsf{OPERATING}$   $\mathsf{PERMIT}$ 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

#### Process/Pollutant Information

**PROCESS NAME:** Alcohol/Butanol Tank (EQT 158)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 14.60 MM GALS/YR

**Process Notes:** Tank volume = 42,203 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0010 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The PSD permit represents the CO limit as "

# Process/Pollutant Information

**PROCESS** Alcohol Tanks (EQTs 159 & 165)

NAME:

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 7.22 MM GALS/YR

Process Notes: Tank volume = 138,924 gallons each Throughput of EQT 165: 7.19 MM gals/yr Group 2 fixed roof storage vessels under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6900 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** VOC limit is per tank.

#### Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 171)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 6.87 MM GALS/YR

**Process Notes:** Tank volume = 132,192 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.6700 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 174)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 11.14 MM GALS/YR

**Process Notes:** Tank volume = 214,173 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.4500 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 176)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 4.56 MM GALS/YR

**Process Notes:** Tank volume = 87,545 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.5800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 182)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 6.87 MM GALS/YR

**Process Notes:** Tank volume = 132,192 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 3.0800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Storage Tank (EQT 188)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 22.08 MM GALS/YR

**Process Notes:** Tank volume = 87,669 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 2.6400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Storage Tank (EQT 189)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 33.30 MM GALS/YR

**Process Notes:** Tank volume = 132,192 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 3.9300 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Alkoxide Tank Service (EQT 205)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 3.67 MM GALS/YR

**Process Notes:** Tank volume = 146,880 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.7600 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 210)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 102.94 MM GALS/YR

**Process Notes:** Tank volume = 635,460 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 15.0500 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Tank (EQT 213)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 11.54 MM GALS/YR

**Process Notes:** Tank volume = 222,082 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.1200 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Alcohol Utility Tower Product Tank (EQT 192)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 19.22 MM GALS/YR

**Process Notes:** Tank volume = 53,500 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.8400 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Hotwash Solvent Tank (EQT 149)

**Process Type:** 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 5.96 MM GALS/YR

**Process Notes:** Tank volume = 108,936 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 8.5800 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Alcohol Utility Tower Product Tank (EQT 193)

Process Type: 64.004 (Storage Tanks (SOCMI only - also see 42.001-42.999 and 62.020))

**Primary Fuel:** 

**Throughput:** 19.22 MM GALS/YR

**Process Notes:** Tank volume = 42,203 gallons Group 2 fixed roof storage vessel under 40 CFR 63 Subpart FFFF

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.7700 TPY ANNUAL MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** ALEX Alkoxide Stripper Tower (EQT 1207)

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to the Elevated Flare

(EQT 0133).

#### Process/Pollutant Information

**PROCESS** Reactor and Tower Process Vents

NAME:

**Process** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

Type:
Primary
Fuel:

Throughput: 0

Process Includes the following sources: Oxidation Reactor (ALC-DC-401C, EQT 0130) ALEX C6 Alcohol Tower (ALC-DA-6001, EQT 1213) ALEX C810

Notes: Alcohol Tower (ALC-DA-6002, EQT 1214) ALEX C1214 Alcohol Tower (ALC-DA-6003, EQT 1215) ALEX C1618 Alcohol Tower (ALC-DA-6004, EQT 1216) ALEX Batch Oxidation Reactor (ALC-DC-4001D, EQT 1225) ALEX Batch Oxidation Reactor (ALC-DC-4001E, EQT 1226) ALEX C60H

Hydrogenation Reactor (ALC-DC-6001, EQT 1228) ALEX C810OH Hydrogenation Reactor (ALC-DC-6002, EQT 1229) ALEX C1214OH Hydrogenation Reactor (ALC-DC-6003, EQT 1230) ALEX C1618OH Hydrogenation Reactor (ALC-DC-6004, EQT 1231) ALEX C20+ Hydrogenation Reactor (ALC-DC-6005, EQT 1232) ALEX ADEH Reactor (ALC-DC-2000, EQT 1218) ALEX Hydrogenation Reactor (ALC-DC-2001A, EQT 1219) ALEX Hydrogenation Reactor (ALC-DC-2001B, EQT 1220) ALEX Ethylation Reactor Stage 1 (ALC-DC-2002A, EQT 1221) ALEX Ethylation Reactor Stage 2 (ALC-DC-2002B, EQT 1222) ALEX Growth Reactor (ALC-DC-3001B, EQT 1223) ALEX Growth Reactor (ALC-DC-3001B, EQT 1224) ALEX Growth Reactor (ALC-DC-3001B, EQT 1225) ALEX Growth Reactor (ALC-DC-3001B, EQT 1226) ALEX Growth Reactor (ALC-DC-3001B, EQT 1226) ALEX Growth Reactor (ALC-DC-3001B, EQT 1227) ALEX Growth Reactor (ALC-DC-3001B, EQT 1228) ALEX Growth Reactor (AL

1224)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, MACT

**Control Method:** (A) Flare

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vents through a closed vent system to the Emission

Combustion Unit #3 Ground Flare (EQT 0500).

## Process/Pollutant Information

**PROCESS NAME:** ALEX Utility Tower (EQT 1217)

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT Control Method: (A) Combustion in a heater

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be routing the above process vent through a closed vent system to Old Hot Oil Heater

ALC-BA-801 (EQT 0119), to New Hot Oil Heater ALC-BA-802 (EQT 0120), or to SSO Column Heater

ALC-H6-404 (EQT 0598).

#### Process/Pollutant Information

**PROCESS** Heat Exchangers

NAME:

**Process** 64.999 (Other SOCMI Processes)

Type: Primary

**Fuel:** 

**Throughput:** 0

**Process** Includes the following sources: ALEX Heat Exchanger (ALC-EA-4205, EQT 1241) ALEX Heat Exchanger (ALC-EA-4206, EQT 1242) ALEX Heat

Notes: Exchanger (ALC-EA-4207, EQT 1243) ALEX Heat Exchanger (ALC-EA-4208, EQT 1244) ALEX Heat Exchanger (ALC-EA-4209, EQT 1245) ALEX Heat Exchanger (ALC-EA-4211, EQT 1246) ALEX Heat Exchanger (ALC-EA-5510, EQT 1247) ALEX Heat Exchanger (ALC-EA-5511, EQT 1248)

ALEX Heat Exchanger (ALC-EA-5512, EQT 1249) ALEX Heat Exchanger (ALC-EA-5518, EQT 1250) ALEX Heat Exchanger (ALC-EA-6002, EQT 1251) ALEX Heat Exchanger (ALC-EA-6004, EQT 1252) ALEX Heat Exchanger (ALC-EA-6005, EQT 1253) ALEX Heat Exchanger (ALC-EA-6006, EQT 1254) ALEX Heat Exchanger (ALC-EA-6009, EQT 1255) ALEX Heat Exchanger (ALC-EA-6018, EQT 1256) ALEX Heat Exchanger (ALC-EA-6023, EQT 1257) ALEX Heat Exchanger (ALC-EA-6031, EQT 1258) ALEX Heat Exchanger (ALC-EA-6032, EQT 1259) ALEX Heat Exchanger (ALC-EA-6033, EQT 1260) ALEX Heat Exchanger (ALC-EA-6036, EQT 1261) ALEX Heat Exchanger (ALC-EA-6038, EQT 1262) ALEX

Heat Exchanger (ALC-EA-6039, EQT 1263)

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: MACT, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 63.104

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT is determined to be compliance with the heat exchange system requirements of 40 CFR 63.104

(regardless if it is otherwise applicable). These provisions require Sasol to monitor the cooling water for the presence of one or more organic hazardous air pollutants or other representative substances whose presence in cooling water indicates a leak, repair any leaks that are detected, and confirm that the heat exchange system is no

longer leaking following repair activities. This section also prescribes recordkeeping and reporting

requirements.

# **Facility Information**

**RBLC ID:** AR-0121 (final) **Date** 

**Determination** 

06/17/2016 Last Updated:

Permit Number: 0573-AOP-R16

Corporate/Company

LSB INDUSTRIES, INC.

Name:

**Facility Name:** EL DORADO CHEMICAL COMPANY **Permit Date:** 

11/18/2013

(actual)

**Facility Contact:** 

GREG WITHROW 8708631484 GWITHROW@EDC-ARK.COM

FRS Number:

110000746373

**Facility Description:** 

CHEMICAL MANUFACTURING, INCLUDING NITRIC ACID PRODUCTION, SUFLURIC ACID

PRODUCTION, AMMONIA PRODUCTION, AND AMMONIA NITRATE PRODUCTION

**SIC Code:** 

2873

B: Add new process to existing facility

**NAICS Code:** 

325311

**Permit URL:** 

**Permit Type:** 

**EPA Region:** 

6

**COUNTRY:** 

USA

**Facility County:** UNION

**Facility State:** 

AR

**Facility ZIP Code:** 

71730

**Permit Issued By:** 

ARKANSAS DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. THOMAS RHEAUME(Agency Contact) (501) 682-0762 rheaume@adeq.state.ar.us

**Other Agency Contact** 

THOMAS RHEAUME, PERMIT BRANCH MANAGER

Info:

JOSEPH HURT, ENGINEER

**Permit Notes:** 

**Affected Boundaries:** 

**Boundary Type:** Class 1 Area State: CLASS1 AL.

**Boundary:** Distance: Sipsey 100km - 50km

**Facility-wide** 

**Pollutant Name:** 

**Facility-wide Emissions Increase:** 

**Emissions:** 

Carbon Monoxide Nitrogen Oxides (NOx) Particulate Matter (PM) Sulfur Oxides (SOx)

161.7000 (Tons/Year) 724.7000 (Tons/Year)

HTTP://WWW.ADEQ.STATE.AR.US/FTPROOT/PUB/WEBDATABASES/PERMITSONLINE/AIR/0573-AOP-R16.PDF

120.9000 (Tons/Year) 403.4000 (Tons/Year) 184.8000 (Tons/Year)

Volatile Organic Compounds (VOC)

Process/Pollutant Information

**PROCESS NAME:** 

DM WEATHERLY NITRIC ACID PLANT # 2

**Process Type:** 

62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 1265.00 T/D

**Process Notes:** 461,725 TON/YR OF 100% HNO3

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Other

**Other Test Method:** 

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0640 LB/TON 30 DAY ROLLING AVERAGE EXCLUDING SSM **Emission Limit 2:** 17.7600 T/YR ROLLING 12 MONTH TOTAL INCLUDING SSM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, SIP, OTHER

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** CEMS TO VERIFY COMPLIANCE THIS SOURCE CONTAINS THE FOLLOWING INTERIM LIMITS

DURING THE FIRST 12 MONTHS OF OPERATION AS ASSIGNED BY THE ADMINISTRATIVE LAW

JUDGE AND APPROVED BY THE ARKANSAS POLLUTION CONTROL AND ECOLOGY COMMISSION: 0.32 LB/TON EXCLUDING SSM (30 DAY ROLLING AVERAGE) 25 PPMV

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2 Test Method: Other

**Other Test Method:** 

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 90.0400 T/YR ROLLING 12 MONTH TOTAL **Emission Limit 2:** 30.0000 PPMV ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP, OTHER

Control Method: (A) TERTIARY CATALYTIC REDUCTION

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: CEMS TO VERIFY COMPLIANCE THIS SOURCE CONTAINS THE FOLLOWING INTERIM LIMITS

DURING THE FIRST 12 MONTHS OF OPERATION AS ASSIGNED BY THE ADMINISTRATIVE LAW

JUDGE AND APPROVED BY THE ARKANSAS POLLUTION CONTROL AND ECOLOGY COMMISSION: 228.10 TPY (ROLLING 12 MONTHS) 76 PPMV (ROLLING 12 MONTHS)

**POLLUTANT NAME:** Ammonia (NH3)

**CAS Number:** 7664-41-7

**Test Method:** EPA/OAR Cond. Test Mthd 027

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 2.6400 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 11.5400 T/YR ROLLING 12 MONTH TOTAL
Standard Emission: 10.0000 PPMV ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: OTHER
Control Method: (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

POLIUTANT/Compliance Notes: PERIODIC STACK TESTING TO VERIFY COMPLANCE THIS SOURCE CONTAINS THE FOLLOWING

INTERIM LIMITS DURING THE FIRST 12 MONTHS OF OPERATION AS ASSIGNED BY THE

ADMINISTRATIVE LAW JUDGE AND APPROVED BY THE ARKANSAS POLLUTION CONTROL AND

ECOLOGY COMMISSION: 5.28 LB/HR (ROLLING 3 HOUR AVERAGE) 22.08 TPY (ROLLING 12

MONTH AVERAGE) 20 PPMV (ROLLING 12 MONTH AVERAGE)

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

Emission Limit 1: %

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

**Case-by-Case Basis:** BACT-PSD **Other Applicable Requirements:** SIP, OTHER

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR) FOR NOX

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 6371.5000 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 27911.3000 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** AMMONIA PLANT PRIMARY REFORMER

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

Primary Fuel: NATURAL GAS

**Throughput:** 1400.00 T/D AMMONIA

**Process Notes:** 824 MMBTU/HR

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: OTHER

Control Method: (P) GOOD AND EFFICIENT COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Test Method:** EPA/OAR Mthd 6C

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.6100 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.4400 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0007 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT COMBUSTION PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 1.1500 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 5.0500 T/YR ROLLING 12 MONTH AVERAGE
Standard Emission: 0.0014 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 15.9900 LB/H ROLLING 3 HOUR AVERAGE **Emission Limit 2:** 70.0200 T/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 0.0194 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT COMBUSTION PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Other

**Other Test Method:** 

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0124 LB/MMBTU ROLLING 30 DAY AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: SIP, OTHER

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: CEMS TO VERIFY COMPLIANCE THIS LIMIT WAS ASSIGNED BY THE ADMINISTRATIVE LAW

JUDGE AND LATER APPROVED BY THE ARKANSAS POLLUTION CONTROL AND ECOLOGY COMMISSION. THE ORIGINAL LIMIT AS PROPOSED BY THE FACILITY WAS 0.0124 LB/MMBTU

(ROLLING 3 HOUR AVERAGE).

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** PERIODIC STACK TESTING TO VERIFY COMPLIANCE

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0022 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Nitrous Oxide (N2O)

**CAS Number:** 10024-97-2

**Test Method:** EPA/OAR Mthd 320

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0002 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: PERIODIC STACK TESTING TO VERIFY COMPLIANCE ASTM D6348-03 OR EQUIVALENT METHOD

MAY BE USED IN LEIU OF EPA METHOD 320

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 96737.6000 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 423714.2000 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** AMMONIA PLANT CONDENSATE STEAM STRIPPER

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 1400.00 T/D AMMONIA PRODUCTION

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 5.8300 LB/H ROLLING 24 HOUR AVERAGE
Emission Limit 2: 25.5500 T/YR ROLLING 12 MONTH AVERAGE
Standard Emission: 0.1000 LB/TON ROLLING 24 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 396.6400 LB/H ROLLING 24 HOUR AVERAGE
Emission Limit 2: 6.8000 LB/TON ROLLING 24 HOUR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Periodic Stack Testing to Verify Compliance**Periodic Stack Testing to Verify Compliance

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 396.7000 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 1737.4000 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** AMMONIA PLANT CO2 REGENERATOR

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

Throughput: 1400.00 T/D AMMONIA PRODUCTION

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1:33.6400 LB/H ROLLING 3 HOUR AVERAGEEmission Limit 2:147.3500 T/YR ROLLING 12 MONTH AVERAGEStandard Emission:0.1060 LB/TON ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 1.1700 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 5.1100 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1:146262.6000 LB/H ROLLING 3 HOUR AVERAGEEmission Limit 2:640669.2000 T/YR ROLLING 12 MONTH AVERAGEStandard Emission:2507.5000 LB/TON ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 146262.6000 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 640669.2000 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** AMMONIA PLANT AMMONIA VENT FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 0.26 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 22

**Pollutant Group(s):** 

Emission Limit 1: %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0008 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0034 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0007 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1:0.0057 LB/H ROLLING 3 HOUR AVERAGEEmission Limit 2:0.0250 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 0.0054 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1:0.0870 LB/H ROLLING 3 HOUR AVERAGEEmission Limit 2:0.3800 T/YR ROLLING 12 MONTH AVERAGEStandard Emission:0.0820 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 792.0300 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 6.9000 T/YR ROLLING 12 MONTH AVERAGE
Standard Emission: 0.0980 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 117.0000 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

 $\label{eq:decisions} \textbf{Did factors, other then air pollution technology considerations influence the BACT decisions:} \quad N$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Pollutant Group(s):** (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0022 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0002 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 719.9000 T/YR ROLLING 12 MONTH AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** AMMONIA PLANT PROCESS SSM FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 0.05 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 22

**Pollutant Group(s):** 

**Emission Limit 1:** %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0007 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0031 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0007 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0051 LB/H ROLLING 3 HOUR AVERAGE **Emission Limit 2:** 0.0230 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 0.0054 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 156.1000 LB/H ROLLING 3 HOUR AVERAGE
Emission Limit 2: 39.3600 T/YR ROLLING 12 MONTH AVERAGE
Standard Emission: 0.0820 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0930 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.4100 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0980 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Methane

**CAS Number:** 74-82-8

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0022 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0002 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 5179.8000 T/YR ROLLING 12 MONTH AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** AMMONIA STORAGE FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS

**Throughput:** 0.05 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 22

**Pollutant Group(s):** 

**Emission Limit 1:** %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** SIP

**Control Method:** (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0001 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0006 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0006 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0011 LB/H ROLLINIG 3 HOUR AVERAGE

Emission Limit 2: 0.0041 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0054 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0170 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0630 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0820 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 10.0200 LB/H ROLLING 3 HOUR AVERAGE **Emission Limit 2:** 43.8800 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 0.0980 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Methane

CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0022 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0002 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG))

**Emission Limit 1:** 89.9900 T/YR ROLLING 12 MONTH AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** AMMONIA PLANT START-UP HEATER

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 38.00 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** %

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: SIP, OTHER

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

CAS Number: 7446-09-5
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.0300 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0070 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0007 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1:0.1900 LB/H ROLLING 3 HOUR AVERAGEEmission Limit 2:0.0480 T/YR ROLLING 12 MONTH AVERAGE

**Standard Emission:** 0.0020 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.7600 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.1900 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0100 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 2.2800 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.5700 T/YR ROLLING 12 MONTH AVERAGE

Standard Emission: 0.0600 LB/MMBTU ROLLING 3 HOUR AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD COMBUSTION PRACTICE

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0022 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0002 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 1115.3100 T/YR ROLLING 12 MONTH AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** START-UP BOILER

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS
Throughput: 240.00 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

Emission Limit 1: %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Sulfur Dioxide (SO2)

**CAS Number:** 7446-09-5

**Test Method:** EPA/OAR Mthd 6C

Pollutant Group(s): (InOrganic Compounds, Oxides of Sulfur (SOx))

Emission Limit 1: 0.1800 LB/H ROLLING 3 HOUR AVERAGE

**Emission Limit 2:** 0.0007 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.9600 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0040 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** SIP

Control Method: (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 8.8800 LB/H ROLLING 3 HOUR AVERAGE

**Emission Limit 2:** 0.0370 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

**Control Method:** (P) GOOD AND EFFICIENT OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Periodic Stack Testing to Verify Compliance**Periodic Stack Testing to Verify Compliance

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.3200 LB/H ROLLING 3 HOUR AVERAGE

Emission Limit 2: 0.0180 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: SIP

Control Method: (P) LOW NOX BURNERS AND FLUE GAS RECIRCULATION

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

PERIODIC STACK TESTING TO VERIFY COMPLIANCE

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

Emission Limit 1: 0.0022 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Standard Emission.

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0002 LB/MMBTU ROLLING 3 HOUR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

Emission Limit 1: 123411.0000 T/YR ROLLING 12 MONTH AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** SIP

Control Method: (P) GOOD OPERATING PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: Date Determination

**Last Updated:** 05/04/2016

Corporate/Company Name: OHIO VALLEY RESOURCES, LLC

Facility Name: OHIO VALLEY RESOURCES, LLC

Permit Number: 147-32322-00062

Permit Date: 09/25/2013 (actual)

Facility Contact: DOUG WILSON 6185990015 FRS Number: 110055148273

Facility Description:NITROGENOUS FERTILIZER PRODUCTION PLANTSIC Code:2873Permit Type:A: New/Greenfield FacilityNAICS Code:325311

**Permit URL:** HTTP://PERMITS.AIR.IDEM.IN.GOV/32322F.PDF

EPA Region: 5 COUNTRY: USA

**Facility County:** SPENCER

Facility State: IN

**Facility ZIP Code:** 47635

Permit Issued By: INDIANA DEPT OF ENV MGMT, OFC OF AIR (Agency Name)

MR. MATT STUCKEY(Agency Contact) (317) 233-0203 mstuckey@idem.in.gov

**Other Agency Contact Info:** SECTION CHIEF:

NATHAN BELL (317) 233-5670

NBELL@IDEM.IN.GOV

PERMIT WRITER:

DAVID MATOUSEK (317) 232-8253

DMATOUSE@IDEM.IN.GOV

**Permit Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** FOUR (4) NATURAL GAS-FIRED BOILERS

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** NATURAL GAS

**Throughput:** 218.00 MMBTU/HR, EACH

**Process Notes:** FUEL INPUT TO ALL FOUR BOILERS SHALL NOT EXCEED 2,802 MMCF/YEAR

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

Unspecified **Test Method:** 

(Particulate Matter (PM)) **Pollutant Group(s):** 

**Emission Limit 1:** 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

**Case-by-Case Basis: BACT-PSD** 

**Other Applicable Requirements:** 

**Control Method:** (P) PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton 0 \$/ton **Incremental Cost Effectiveness: Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

**Test Method:** Unspecified

**Pollutant Group(s):** (Particulate Matter (PM)) **Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 20.4000 LB/MMCF 24-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) ULTRA LOW NOX BURNERS FLUE GAS RECIRCULATION

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 37.2200 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 TONS/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION; ENERGY EFFICIENT DESIGN: AIR INLET

CONTROLS, HEAT RECOVERY, CONDENSATE RECOVERY AND BLOWDOWN HEAT RECOVERY

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: MUST ACHIEVE A THERMAL EFFICIENCY OF 80% BASED ON THE HIGHER HEATING VALUE.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** PRIMARY REFORMER

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

Primary Fuel: NATURAL GAS

**Throughput:** 1006.40 MMBTU/H

Process Notes: NOX CEMS

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 9.0000 PPMVD 30 DAY ROLLING AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) SELECTIVE CATALYTIC REDUCTION (SCR) AND GOOD COMBUSTION PRACTICES

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown
Pollutant/Compliance Notes: NOX CEMS

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 43.4500 LB/MMCF 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5100 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 TONS/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES; PROPER DESIGN: AIR INLET CONTROLS, AND FLUE GAS

HEAT RECOVERY.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: MUST ACHIEVE A THERMAL EFFICIENCY OF 90% BASED ON THE HIGHER HEATING VALUE CO2

EMISSIONS SHALL NOT EXCEED 515,246 TONS PER YEAR.

## Process/Pollutant Information

**PROCESS NAME:** CO2 PURIFICATION PROCESS

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 3570.00 TON CO2 PER DAY

**Process Notes:** AMMONIA PRODUCTION LIMITED TO 1,022,000 TONS PER YEAR.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0117 LB/TON OF AMMONIA 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) PROCESS CATALYST AND GOOD OPERATIONAL PROCEDURES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0558 LB/TON AMMONIA 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) LOW VOC CATALYST

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 1.2750 TON CO2/TON AMMONIA 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATIONAL PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS** FRONT END PROCESS FLARE

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** NATURAL GAS PILOT

**Throughput:** 0.25 MMBTU/H

Process Notes: HEAT INPUT IS FOR NATURAL GAS PILOT ONLY. SSM EMISSIONS ARE CONTROLLED BY THE FLARE AND ARE LIMITED TO 336

HOURS OF VENTING PER YEAR.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 3240.1600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 47.2600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS FOR PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 116.8900 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 511.8000 TON/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HOURS PER YEAR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBUT 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS FOR PILOT FLARE, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NO ADDITIONAL PM EMISSIONS DURING VENTING EVENTS

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Control Method: (P) NATURAL GAS FOR PILOT, AND FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: NO ADDITIONAL PM10 EMISSIONS DURING VENTING EVENTS

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS FOR PILOT, USE FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 595.4700 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING HOURS LIMITED TO 336 PER YEAR.

### Process/Pollutant Information

**PROCESS NAME:** AMMONIA CATALYST STARTUP HEATER

**Process Type:** 12.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

Primary Fuel: NATURAL GAS

**Throughput:** 106.30 MMBTU/H

Process Notes: ANNUAL NATURAL GAS USAGE LIMITED TO 20.84 MMCF.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.9000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 7.6000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 183.7000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS ARE TYPICALLY CONSIDERED NOT FEASIBLE FOR LIMITED USE EMISSION

UNITS.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 37.2300 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: ADD ON CONTROL TYPICALLY CONSIDERED NOT FEASIBLE FOR LIMITED USE EMISSION

UNITS.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 5.5000 LB/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS TYPICALLY CONSIDERED NOT FEASIBLE ON LIMITED USE EMISSION

UNITS.

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 59.6100 TON/MMCF 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS COMBUSTION ONLY, PROPER DESIGN AND GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: BACK END AMMONIA FLARE

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 0.25 MMBTU/H

Process Notes: HEAT INPUT IS FOR PILOT ONLY. SSM EMISSIONS ARE CONTROLLED BY THE FLARE AND ARE LIMITED TO 336 HR/YR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NO ADDITIONAL PM IS ANTICIPATED DURING SSM VENTING.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO ADDITIONAL EMISSIONS FOR SSM EVENTS.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 624.9400 LB/H, SSM EVENTS 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM EVENTS LIMITED TO 336 HRS PER YEAR

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 804.7600 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 11.7300 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 116.8900 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 127.1200 TON/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS** AMMONIA STORAGE FLARE

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: NATURAL GAS
Throughput: 0.13 MMBTU/H

Process Notes: HEAT INPUT IS FOR PILOT ONLY. SSM EVENTS HAVE SEPARATE LIMITS. SSM VENTING IS LIMITED TO 168 HOURS PER YEAR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 168 HR PER YEAR.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM EVENTS ARE LIMITED TO 168 HR PER YEAR.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 168 HR PER YEAR.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 125.0000 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING IS LIMITED TO 168 HR PER YEAR.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** SSM EMISSIONS LIMITED TO 168 HR PER YEAR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 168 HR PER YEAR.

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 52.0200 LB/H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS** TWO (2) NITRIC ACID UNITS

NAME:

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 630.00 TONS NITRIC ACID/DAY, EACH

Process Notes: COMBINED NITRIC ACID PRODUCTION FROM BOTH PLANTS IS LIMITED TO 459,900 TONS OF 100% NITRIC ACID PER YEAR.

**POLLUTANT NAME:** Nitrous Oxide (N2O)

CAS Number: 10024-97-2
Test Method: Unspecified

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 1.0500 LB/TON 100% ACID 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) CATALYTIC DECOMPOSITION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.5000 LB/TON 100% ACID 30 DAY AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** TWO (2) AMMONIUM NITRATE UNITS

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 798.00 TON AN PER DAY, EACH

**Process Notes:** UAN PRODUCTION IS LIMITED TO 1,314,000 TONS PER YEAR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0128 LB/TON OF UAN 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) WET SCRUBBER WITH HIGH EFFICIENCY DEMISTER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0128 LB/TON UAN 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) WET SCRUBBER WITH HIGH EFFICIENCY DEMISTER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0128 LB/TON UAN 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) WET SCRUBBER WITH HIGH EFFICIENCY DEMISTER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): ( Acid Gasses/Mist , Greenhouse Gasses (GHG) , InOrganic Compounds )

**Emission Limit 1:** 132.3100 LB/TON UAN 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD OPERATIONAL PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

PROCESS NAME: LIQUID UAN LOADOUT

**Process Type:** 42.010 (Volatile Organic Liquid Marketing (except 42.009))

**Primary Fuel:** 

**Throughput:** 1314000.00 TONS UAN PER YEAR

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) SUBMERGED FILL AND CLEAN CARGO CARRIER OPERATION

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** UAN PLANT VENT FLARE

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

**Throughput:** 0.19 MMBTU/H

Process Notes: HEAT INPUT IS FOR NATUAL GAS PILOT. SSM EMISSIONS HAVE SEPARATE LIMITS. SSM VENTING LIMITED TO 336 HOURS

PER YEAR.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0019 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** SSM VENTING IS LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0075 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0680 LB/MMBTU 3-HR AVERAGE

Emission Limit 2: 332.0800 LB/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.3700 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0054 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 116.8900 LB/MMBTU 3-HR AVERAGE

**Emission Limit 2:** 5.5900 TON/H, SSM VENTING 3-HR AVERAGE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) NATURAL GAS PILOT, FLARE MINIMIZATION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** SSM VENTING LIMITED TO 336 HR PER YEAR.

## Process/Pollutant Information

**PROCESS NAME:** TWO (2) UAN STORAGE TANKS

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

**Throughput:** 30000.00 TONS UAN, EACH

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Control Method: (P) WHITE TANK SHELLS, USE SUBMERGED FILL.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** THREE (3) UAN DAY TANKS

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

**Throughput:** 750.00 TONS UAN, EACH

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) WHITE TANK SHELLS, SUBMERGED FILL

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: ONE (1) DIESEL EXHAUST FLUID (DEF) TANK

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

**Throughput:** 100.00 TONS UAN

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) WHITE TANK SHELL, SUBMERGED FILL

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: ONE (1) DIESEL EXHAUST FLUID (DEF) TRUCK LOADOUT

**Process Type:** 42.010 (Volatile Organic Liquid Marketing (except 42.009))

**Primary Fuel:** 

**Throughput:** 1314000.00 TONS UAN PER YEAR

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) USE OF SUBMERGED FILL

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** TWO (2) NITRIC ACID STORAGE TANKS

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 806842.00 TONS OF 57% ACID PER YEAR.

Process Notes: PERMIT LIMITS NITRIC ACID THROUGHPUT TO 806,842 TONS OF 57% ACID PER YEAR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.0015 LB NOX/TON 57% ACID 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) SUBMERGED FILL

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** DIESEL-FIRED EMERGENCY GENERATOR

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: NO. 2 FUEL OIL

**Throughput:** 4690.00 B-HP

**Process Notes:** ANNUAL HOURS OF OPERATION NOT TO EXCEED 200 HOURS.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 LB/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 4.4600 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 2.6100 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 0.3100 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 526.3900 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

## Process/Pollutant Information

**PROCESS NAME:** DIESEL-FIRED EMERGENCY WATER PUMP

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: NO. 2 FUEL OIL

**Throughput:** 481.00 BHP

**Process Notes:** ANNUAL OPERATION LIMITED TO 200 HR,

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1500 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.8600 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) GOOD COMBUSTION PRACTICES

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 2.6000 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC)) **Emission Limit 1:** 0.1410 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

**POLLUTANT NAME:** Carbon Dioxide

CAS Number: 124-38-9
Test Method: Unspecified

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 527.4000 G/B-HP-H 3-HR AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** ADD ON CONTROLS ARE NOT NORMALLY REQUIRED FOR LIMITED USE EMISSION UNITS.

# Process/Pollutant Information

**PROCESS NAME:** TWO (2) COOLING TOWERS

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 179720.00 GPM, COMBINED

**Process Notes:** ONE UNIT IS EIGHT CELL, THE OTHER IS SIX CELL.

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % DRIFT CONTINUOUS

Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 4592 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOWERS USE ONSITE WELL WATER. IT IS HAS HIGHER THAN NORMAL TDS. COST

EFFECTIVENESS BASED ON REDUCTION OF TDS FROM 2,000 MG/L TO 1,500 MG/L. ADVERSE

ENVIRONMENTAL IMPACTS WERE CONSIDERED.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 % DRIFT CONTINUOUS

Emission Limit 2: 2000.0000 MG/L TDS CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 4592 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** TOWERS USE ONSITE WELL WATER. IT IS HAS HIGHER THAN NORMAL TDS. COST

EFFECTIVENESS BASED ON REDUCTION OF TDS FROM 2,000 MG/L TO 1,500 MG/L. ADVERSE

ENVIRONMENTAL IMPACTS WERE CONSIDERED.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0005 % DRIFT CONTINUOUS
Emission Limit 2: 2000.0000 MG/L CONTINUOUS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) HIGH EFFICIENCY DRIFT ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 4592 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: TOWERS USE ONSITE WELL WATER, IT IS HAS HIGHER THAN NORMAL TDS. COST

EFFECTIVENESS BASED ON REDUCTION OF TDS FROM 2,000 MG/L TO 1,500 MG/L. ADVERSE

ENVIRONMENTAL IMPACTS WERE CONSIDERED.

# Process/Pollutant Information

PROCESS NAME: PAVED ROADWAYS AND PARKING LOTS WITH PUBLIC ACCESS

**Process Type:** 99.140 (Paved Roads)

**Primary Fuel:** 

**Throughput:** 17160.00 VEHICLE MILES TRAVELED

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable (FPM)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL PLANT HAUL ROADS, DAILY SWEEPING AND WET SUPPRESSION, PROMPT

CLEANUP OF ANY SPILLED MATERIAL

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL PLANT HAUL ROADS, DAILY SWEEPING AND WET SUPPRESSION, PROMPT

CLEANUP OF ANY SPILLED MATERIAL

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 90.0000 % CONTROL CONTINUOUS

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) PAVE ALL PLANT HAUL ROADS, DAILY SWEEPING AND WET SUPPRESSION, PROMPT

CLEANUP OF ANY SPILLED MATERIAL

Est. % Efficiency: 90.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** FUGITIVE VOC EMISSIONS

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) USE OF A LEAK DETECTION AND REPAIR (LDAR) PROGRAM USING 40 CFR 60, SUBPART VVA

PROCEDURES.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: LA-0272 (final) Date Determination

Corporate/Company Name: DYNO NOBEL LOUISIANA AMMONIA, LLC Permit Number: PSD-LA-768

Facility Name: AMMONIA PRODUCTION FACILITY Permit Date: 03/27/2013 (actual)

Facility Contact: BARBARA CABOT (307)

771-5644 BARBARA.CABOT@AM.DYNONOBEL.COM

Facility Description:2780 TON PER DAY AMMONIA PRODUCTION FACILITYSIC Code:2873

Permit Type: A: New/Greenfield Facility NAICS Code: 325311

Permit URL:

EPA Region: 6 COUNTRY: USA

Facility County: JEFFERSON

Facility State: LA

Facility ZIP Code: 70094

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: PERMIT WRITER: DASHENG "VICTOR" CHU, (225) 219-3417

**Permit Notes:** COMPLETE APPLICATION DATE = DATE OF ADMINISTRATIVE COMPLETENESS PSD-LA-768(M-1), ISSUED OCTOBER 14,

2013, CORRECTED THE CAPACITY OF THE AMDEA TANK (2009-F), REVISED THE EMISSION LIMITATIONS FOR THE AMMONIA STORAGE FLARE (2202-B). AND ADDED STARTUP EMISSIONS ATTRIBUTED TO THIS FLARE TO THE

FRS Number:

Unknown

PERMIT. THESE CHANGES ARE REFLECTED IN THIS RBLC ENTRY.

#### Process/Pollutant Information

**PROCESS** PRIMARY REFORMER FURNACE (101-B)

NAME:

**Process Type:** 11.390 (Other Gaseous Fuel & Gaseous Fuel Mixtures)

**Primary Fuel:** NATURAL GAS

**Throughput:** 956.20 MM BTU/HR

Process Notes: NATURAL GAS: 613.5 MM BTU/HR PURIFIER WASTE GAS: 326.1 MM BTU/HR HIGH PRESSURE FLASH GAS: 10.4 MM BTU/HR LP

SCRUBBER OVERHEAD: 6.2 MM BTU/HR

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 8.5500 LB/H HOURLY MAXIMUM **Emission Limit 2:** 31.2100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 8.5500 LB/H HOURLY MAXIMUM **Emission Limit 2:** 31.2100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 16.1500 LB/H HOURLY MAXIMUM
Emission Limit 2: 58.9600 T/YR ANNUAL MAXIMUM

Standard Emission: 0.0140 LB/MM BTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (A) SELECTIVE CATALYTIC REDUCTION (SCR) AND LOW NOX BURNERS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 49.1600 LB/H HOURLY MAXIMUM Emission Limit 2: 179.4300 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 6.1900 LB/H HOURLY MAXIMUM
Emission Limit 2: 22.5800 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 490025.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Energy efficiency measures: process integration and improved combustion measures (i.e., combustion

tuning, optimization using parametric testing, installation of advanced digital instrumentation).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** AMMONIA START-UP HEATER (102-B)

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: NATURAL GAS

**Throughput:** 59.40 MM BTU/HR

**Process Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.5300 LB/H HOURLY MAXIMUM **Emission Limit 2:** 0.1100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5300 LB/H HOURLY MAXIMUM Emission Limit 2: 0.1100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 14.6500 LB/H HOURLY MAXIMUM
Emission Limit 2: 3.0500 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 2.9700 LB/H HOURLY MAXIMUM Emission Limit 2: 0.6200 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.3800 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0800 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 1738.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Energy efficiency measures: use of economizers and boiler insulation; improved combustion measures (i.e.,

tuning, optimization, and instrumentation); and minimization of air infiltration.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** HEATER IS PERMITTED TO OPERATE 500 HOURS PER YEAR.

### Process/Pollutant Information

**PROCESS NAME:** CO2 STRIPPER VENT (102-E)

**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 115.83 TONS/HR

**Process Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 1.4900 LB/H HOURLY MAXIMUM Emission Limit 2: 6.5400 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) MAXIMIZATION OF THE SHIFT CONVERSION EFFICIENCY AND GOOD COMBUSTION

**PRACTICES** 

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 21.7800 LB/H HOURLY MAXIMUM
Emission Limit 2: 95.3800 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 1280000.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) IMPROVED SOLVENTS TO MINIMIZE ENERGY USED TO CIRCULATE AND REGENERATE

SOLVENT; ENERGY EFFICIENCY MEASURES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** COOLING TOWER (2101-U)

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 93467.00 GAL/MIN

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3400 LB/H HOURLY MAXIMUM Emission Limit 2: 1.2300 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) HIGH EFFICIENCY DRIFT ELIMINATORS TO CONTROL DRIFT TO NO MORE THAN 0.0005%.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5600 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.0500 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) HIGH EFFICIENCY DRIFT ELIMINATORS TO CONTROL DRIFT TO NO MORE THAN 0.0005%.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS COMMISSIONING BOILERS 1 & 2 (CB-1 & CB-2)

NAME:

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** NATURAL GAS **Throughput:** 217.50 MM BTU/HR

Process Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet the definition of "temporary boiler" in

40 CFR 60.41b.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.9400 LB/H HOURLY MAXIMUM
Emission Limit 2: 3.5700 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet

the definition of "temporary boiler" in 40 CFR 60.41b.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.9400 LB/H HOURLY MAXIMUM **Emission Limit 2:** 3.5700 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet

the definition of "temporary boiler" in 40 CFR 60.41b.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 11.9200 LB/H HOURLY MAXIMUM
Emission Limit 2: 21.8600 T/YR ANNUAL MAXIMUM
Standard Emission: 0.0500 LB/MM BTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) FLUE GAS RECIRCULATION, LOW NOX BURNERS, AND GOOD COMBUSTION PRACTICES

(I.E., PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS; MAINTAINING THE PROPER

AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE TEMPERATURE).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet

the definition of "temporary boiler" in 40 CFR 60.41b.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 10.8700 LB/H HOURLY MAXIMUM Emission Limit 2: 19.9300 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) GOOD COMBUSTION PRACTICES: PROPER DESIGN OF BURNER AND FIREBOX COMPONENTS;

MAINTAINING THE PROPER AIR-TO-FUEL RATIO, RESIDENCE TIME, AND COMBUSTION ZONE

TEMPERATURE.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet

the definition of "temporary boiler" in 40 CFR 60.41b.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 1.4100 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.5800 T/YR ANNUAL MAXIMUM

**Standard Emission:** 0.0054 LB/MM BTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (B) FLUE GAS RECIRCULATION AND GOOD COMBUSTION PRACTICES (I.E., PROPER DESIGN OF

BURNER AND FIREBOX COMPONENTS; MAINTAINING THE PROPER AIR-TO-FUEL RATIO,

RESIDENCE TIME, AND COMBUSTION ZONE TEMPERATURE).

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet

the definition of "temporary boiler" in 40 CFR 60.41b.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 55986.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Energy efficiency measures: use of economizers and boiler insulation; improved combustion measures (i.e.,

tuning, optimization, and instrumentation); and minimization of air infiltration.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: COMMISSIONING BOILERS ARE PERMITTED TO OPERATE FOR 4400 HOURS EACH. Boilers meet

the definition of "temporary boiler" in 40 CFR 60.41b.

#### Process/Pollutant Information

**PROCESS NAME:** EMERGENCY DIESEL GENERATOR (2205-B)

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: DIESEL

**Throughput:** 1200.00 HP

**Process Notes:** OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 0.2000 G/KW-HR

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT, NSPS

Control Method: (P) Compliance with 40 CFR 60 Subpart IIII; good combustion practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR.

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 0.2000 G/KW-HR

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; good combustion practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 6.4000 G/KW-HR NOX + NMHC

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; good combustion practices.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR. NOTE THAT THE 6.4 G/KW-HR

LIMIT APPLIES TO NOX + NMHC CONSISTENT WITH 40 CFR 60 SUBPART IIII.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1: Emission Limit 2:** 

**Standard Emission:** 3.5000 G/KW-HR

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS, OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; good combustion practices.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 

**Emission Limit 2:** 

**Standard Emission:** 6.4000 G/KW-HR NOX + NMHC

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) Compliance with 40 CFR 60 Subpart IIII; good combustion practices.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR. NOTE THAT THE 6.4 G/KW-HR

LIMIT APPLIES TO NOX + NMHC CONSISTENT WITH 40 CFR 60 SUBPART IIII.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (P) ENERGY EFFICIENCY MEASURES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: OPERATING TIME OF GENERATOR IS LIMITED TO 500 HR/YR. THE PSD PERMIT DOES NOT

ESTABLISH MASS EMISSION LIMITS FOR CO2E EMISSIONS.

#### Process/Pollutant Information

**PROCESS NAME:** AMDEA STORAGE TANK (2009-F)

**Process Type:** 42.009 (Volatile Organic Liquid Storage)

**Primary Fuel:** 

Throughput: 0

Process Notes: 395,000 GALLONS

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: THE PSD PERMIT DOES NOT ESTABLISH MASS EMISSION LIMITS FOR THE AMDEA STORAGE

TANK. TANK EMITS ONLY 0.003 TPY VOC.

### Process/Pollutant Information

**PROCESS NAME:** FUGITIVE EMISSIONS (FUG)

**Process Type:** 62.999 (Other Inorganic Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: THE PSD PERMIT DOES NOT ESTABLISH MASS EMISSION LIMITS FOR FUGITIVE EMISSIONS. NO

LDAR PROGRAM PRESCRIBED.

## Process/Pollutant Information

**PROCESS NAME:** AMMONIA STORAGE FLARE (2202-B)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: NATURAL GAS (PILOT): 0.25 MM BTU/HR VENT GAS: 14.94 MM BTU/HR

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0010 LB/H HOURLY MAXIMUM Emission Limit 2: 0.0050 TPY ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

Pollutant/Compliance Notes: STARTUP PM10 LIMITS ATTRIBUTED TO THIS FLARE (2202-B SU, EQT 0014): 0.029 LB/HR & 0.04

TPY.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.0010 LB/H HOURLY MAXIMUM Emission Limit 2: 0.0050 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: STARTUP PM2.5 LIMITS ATTRIBUTED TO THIS FLARE (2202-B SU, EQT 0014): 0.029 LB/HR & 0.04

TPY.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0400 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.1300 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: STARTUP NOX LIMITS ATTRIBUTED TO THIS FLARE (2202-B SU, EQT 0014): 30.99 LB/HR & 9.75

TPY.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 0.2000 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.7100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: STARTUP CO LIMITS ATTRIBUTED TO THIS FLARE (2202-B SU, EQT 0014): 15.67 LB/HR & 2.19 TPY.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0030 LB/H HOURLY MAXIMUM

**Emission Limit 2:** 0.0100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 290.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) ENERGY EFFICIENCY MEASURES (I.E., MINIMIZE THE AMOUNT OF GAS ROUTED TO THE

FLARE).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** STARTUP CO2E LIMIT ATTRIBUTED TO THIS FLARE (2202-B SU, EQT 0014): 156 TPY.

### Process/Pollutant Information

**PROCESS NAME:** FRONT END PROCESS FLARE (2203-B)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

Process Notes: NATURAL GAS (PILOT): 1.829 MM BTU/HR VENT GAS: 6782.433 MM BTU/HR

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 LB/H HOURLY MAXIMUM **Emission Limit 2:** 0.0200 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0050 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0200 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.1500 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.5400 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.8100 LB/H HOURLY MAXIMUM Emission Limit 2: 2.9600 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 1202.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) ENERGY EFFICIENCY MEASURES (I.E., MINIMIZE THE AMOUNT OF GAS ROUTED TO THE

FLARE).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0100 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0400 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

#### Process/Pollutant Information

**PROCESS NAME:** BACK END PROCESS FLARE (2204-B)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: NATURAL GAS (PILOT): 1.829 MM BTU/HR VENT GAS: 8981.014 MM BTU/HR

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0050 LB/H HOURLY MAXIMUM **Emission Limit 2:** 0.0200 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0050 LB/H HOURLY MAXIMUM Emission Limit 2: 0.0200 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.1500 LB/H HOURLY MAXIMUM **Emission Limit 2:** 0.5400 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.8100 LB/H HOURLY MAXIMUM
Emission Limit 2: 2.9600 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0100 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0400 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

**Test Method:** Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 1202.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) ENERGY EFFICIENCY MEASURES (I.E., MINIMIZE THE AMOUNT OF GAS ROUTED TO THE

FLARE).

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** Mass limits in PSD permit exclude emissions associated with startup.

## Process/Pollutant Information

**PROCESS NAME:** RAIL LOADING FLARE (2205-B)

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 0.25 MM BTU/HR

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0010 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0030 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0010 LB/H HOURLY MAXIMUM **Emission Limit 2:** 0.0030 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0300 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0800 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.1100 LB/H HOURLY MAXIMUM Emission Limit 2: 0.4000 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

Pollutant Group(s): (Volatile Organic Compounds (VOC))
Emission Limit 1: 0.0010 LB/H HOURLY MAXIMUM
Emission Limit 2: 0.0100 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS

OF 40 CFR 63 SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT

AT ALL TIMES.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e

Test Method: Unspecified

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 3990.0000 TPY ANNUAL MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: OPERATING PERMIT

Control Method: (P) ENERGY EFFICIENCY MEASURES (I.E., MINIMIZE THE AMOUNT OF GAS ROUTED TO THE

FLARE).

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: IA-0105 (final) Date Determination

Corporate/Company Name: IOWA FERTILIZER COMPANY Last Updated: 08/13/2013

Permit Number: 12-219

Facility Name: IOWA FERTILIZER COMPANY Permit Date: 10/26/2012 (actual)

Facility Contact: DAVE PEARSON (319) FRS Number: 110054890392

246-2308 DAVE.PEARSON@IOWAFERTILIZERS.COM

Facility Description:NITROGENEOUS FERTILIZER MANUFACTURINGSIC Code:2873

**Permit Type:** A: New/Greenfield Facility **NAICS Code:** 325311

**Permit URL:** https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp ,https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp

,https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp ,https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp ,https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp ,https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp .https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp .https://aqbweb.iowadnr.gov/airpermit/eepsdpermit.jsp

EPA Region: 7 COUNTRY: USA

Facility County: LEE
Facility State: IA

Facility ZIP Code: 52658

**Permit Issued By:** IOWA DEPARTMENT OF NATURAL RESOURCES AIR QUALITY (Agency Name)

MR. GARY SMITH(Agency Contact) (515) 725-9563 GARY.SMITH@DNR.IOWA.GOV

Other Agency Contact Info: CHRISTOPHER A. ROLING, PE

ENVIRONMENTAL ENGINEER SENIOR

(515) 725-9557

CHRIS.ROLING@DNR.IOWA.GOV

Permit Notes: THE PROJECT WAS AMENDED ON 3/13/14 DUE TO SOME DESIGN CHANGES WHICH INCLUDED ADDITIONAL

EMISSION UNITS/POINTS. THE NEW PROJECT IS UNDER PROJECT NUMBER/PERMIT NUMBER 13-355

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 111.0000 (Tons/Year)
Nitrogen Oxides (NOx) 95.7000 (Tons/Year)
Particulate Matter (PM) 84.6000 (Tons/Year)
Sulfur Oxides (SOx) 3.3000 (Tons/Year)
Volatile Organic Compounds (VOC) 59.7000 (Tons/Year)

#### Process/Pollutant Information

**PROCESS NAME:** Primary Reformer

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

Primary Fuel: natural gas

**Throughput:** 1.13 million cubic feet/h

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0024 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 11.9000 TONS/YR ROLLING 12 MONTH TOTAL

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0024 LB/MMTU AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 11.9000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and Mthd 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0024 LB/MMBTU AVERAGE OF 3 TEST RUNS
Emission Limit 2: 11.9000 TONS/YR ROLLING 12 MONTH TOTAL

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

Emission Limit 1: %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operation practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 9.0000 PPMV 30 DAY ROLLING AVERAGE
Emission Limit 2: 56.0000 TONS/YR ROLLING 12 MONTH TOTAL

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Selective Catalytic Reduction (SCR)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0014 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 6.9500 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

Test Method: EPA/OAR Mthd 10
Pollutant Group(s): (InOrganic Compounds)

Emission Limit 1: 0.0194 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 96.3000 TONS/YR ROLLING 12 MONTH TOTAL

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 30 DAY AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

Emission Limit 1: 0.0023 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

**CAS Number:** 10024-97-2

**Test Method:** EPA/OAR Mthd 320

**Pollutant Group(s):** (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0006 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 596905.0000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: B

**BACT-PSD** 

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** CO2 Regenerator

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 3012.00 metric tons/day

**Process Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

Pollutant Group(s): (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.1060 LB/TON OF AMMONIA AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 51.2000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good operational practices

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 0.0200 LB/TON OF AMMONIA AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 9.6500 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operational practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 1.2600 TONS/TON OF AMMONIA ROLLING 30 DAY AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operational practices

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 1211847.0000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operational practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Urea Ammonia Nitrate (UAN) Mixing Tank

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** The maximum capacity of the tank is 5,400 metric tons and it has an Acid Scrubber to control ammonia.

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 1.1000 LB/H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good operational practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 4.9200 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good operational practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Urea Synthesis

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 2500.00 metric tons/day

Process Notes: There is an Acid Scrubber for ammonia control

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 165.4000 LB/H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good operational practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** ( Greenhouse Gasses (GHG) )

**Emission Limit 1:** 724.5000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) good operational practices

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

Process/Pollutant Information

PROCESS NAME: Nitric Acid Plant

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 1905.00 metric tons/day

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 5.0000 PPMV ROLLING 30 DAY AVERAGE
Emission Limit 2: 30.0000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) De-NOx system

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

**CAS Number:** 10024-97-2

**Test Method:** EPA/OAR Mthd 320

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 30.0000 PPMV AVERAGE OF 3 TEST RUNS

**Emission Limit 2:** 98.0000 % REDUCTION AVERAGE OF 3 TEST RUNS

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) De-N2O system

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

Emission Limit 1: 40.0000 PPMV AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good operational practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: 29543.0000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) De-N2O system

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** Nitric Acid Storage Tank

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** The maximum storage capacity of the tank is 1,935,773 gallons

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.7200 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Acid/Water Vent Lock

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Auxiliary Boiler

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: natural gas

**Throughput:** 472.40 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0024 LB/MMBTU AVERAGE OF 3 TEST RUNS
Emission Limit 2: 1.0600 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and Mthd 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0024 LB/MMBTU AVERAGE OF 3 TEST RUNS
Emission Limit 2: 1.0600 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.0024 LB/MMBTU AVERAGE OF 3 TEST RUNS
Emission Limit 2: 1.0600 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** % OPACITY

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0125 LB/MMBTU ROLLING 30 DAY AVERAGE **Emission Limit 2:** 5.5200 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (A) Low NOx Burners (LNB) and Flue Gas Recirculation (FGR)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0014 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.6200 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 0.0013 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.5700 TON/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU ROLLING 30 DAY AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0023 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

**CAS Number:** 10024-97-2

**Test Method:** EPA/OAR Mthd 320

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1:	0.0006 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS				
<b>Emission Limit 2:</b>					
Standard Emission:					
Did factors, other then air pollut	ors, other then air pollution technology considerations influence the BACT decisions: U				
Case-by-Case Basis:	BACT-PSD				
Other Applicable Requirements:					
Control Method:	(P) good combustion practices				
Est. % Efficiency:					
<b>Cost Effectiveness:</b>	0 \$/ton				
<b>Incremental Cost Effectiveness:</b>	0 \$/ton				
Compliance Verified:	Unknown				
<b>Pollutant/Compliance Notes:</b>					
<b>POLLUTANT NAME:</b>	Carbon Dioxide Equivalent (CO2e)				
POLLUTANT NAME: CAS Number:	Carbon Dioxide Equivalent (CO2e) CO2e				
CAS Number:	CO2e				
CAS Number: Test Method:	CO2e Other				
CAS Number: Test Method: Other Test Method:	CO2e Other recordkeeping				
CAS Number: Test Method: Other Test Method: Pollutant Group(s):	CO2e Other recordkeeping ( Greenhouse Gasses (GHG) )				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1:	CO2e Other recordkeeping ( Greenhouse Gasses (GHG) )				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1: Emission Limit 2: Standard Emission:	CO2e Other recordkeeping ( Greenhouse Gasses (GHG) )				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1: Emission Limit 2: Standard Emission:	CO2e Other recordkeeping ( Greenhouse Gasses (GHG) ) 51748.0000 TONS/YR ROLLING 12 MONTH TOTAL				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollut	CO2e Other recordkeeping (Greenhouse Gasses (GHG)) 51748.0000 TONS/YR ROLLING 12 MONTH TOTAL  ion technology considerations influence the BACT decisions: U BACT-PSD				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollut Case-by-Case Basis:	CO2e Other recordkeeping (Greenhouse Gasses (GHG)) 51748.0000 TONS/YR ROLLING 12 MONTH TOTAL  ion technology considerations influence the BACT decisions: U BACT-PSD				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollut Case-by-Case Basis: Other Applicable Requirements:	CO2e Other recordkeeping (Greenhouse Gasses (GHG)) 51748.0000 TONS/YR ROLLING 12 MONTH TOTAL  ion technology considerations influence the BACT decisions: U BACT-PSD				
CAS Number: Test Method: Other Test Method: Pollutant Group(s): Emission Limit 1: Emission Limit 2: Standard Emission: Did factors, other then air pollut Case-by-Case Basis: Other Applicable Requirements: Control Method:	CO2e Other recordkeeping (Greenhouse Gasses (GHG)) 51748.0000 TONS/YR ROLLING 12 MONTH TOTAL  ion technology considerations influence the BACT decisions: U BACT-PSD				

**Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

Process	s/Pol	lutant	Infor	matio
1 1000000	)/ I (/I	iulaiil		Hally

Process Type: 19.310 (Chemical Plant Flares)
Primary Fuel: natural gas
Throughput: 0.40 MMBTU/H

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

**POLLUTANT NAME:** 

**Process Notes:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Particulate matter, total (TPM)

There are four (4) natural gas pilots

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) work practice/good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) work practice/good combustion practices

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) work practice/good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 22

**Pollutant Group(s):** 

**Emission Limit 1:** %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) work practice/good combustion practices

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

**CAS Number:** 10024-97-2

**Test Method:** EPA/OAR Mthd 320

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) work practice/good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (P) work practice/good combustion practices

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) work practice/good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) work practice/good combustion practices

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1: Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) work practice/good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) work practice/good combustion practices

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) work practice/good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permit.

# Process/Pollutant Information

**PROCESS NAME:** Emergency Generator

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: diesel fuel

**Throughput:** 142.00 GAL/H

Process Notes: rated @ 2,000 KW

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 0.2200 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.2000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 0.2200 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 0.2200 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** 5.0000 % OPACITY 6 MINUTE AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 20% opacity is allowed during periods of startup, shutdown, malfunction (SSM)

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 6.0000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 6.6100 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.4000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.4400 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** 3.5000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 3.8600 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 788.5000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 1.5500 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0001 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** Fire Pump

**Process Type:** 17.210 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

Primary Fuel: diesel fuel

**Throughput:** 14.00 GAL/H

**Process Notes:** rated @ 235 KW

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.2000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 0.0300 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2000 G/KW-H AVERAGE OF 3 STACK TEST RUNS
Emission Limit 2: 0.0300 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.2000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 0.0300 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** 5.0000 % 6 MINUTE AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** standard is 20% during periods of startup, shutdown, and malfunction (SSM)

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 3.7500 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.4900 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

Emission Limit 1: 0.2500 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.0300 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

**Pollutant Group(s):** (InOrganic Compounds)

Emission Limit 1: 3.5000 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.4500 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

**Emission Limit 1:** 1.5500 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane

**CAS Number:** 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0001 G/KW-H AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 91.0000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS NAME:** Startup Heater

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural gas

**Throughput:** 110.12 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.0024 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.0100 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0024 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.0100 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0024 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.0100 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.0014 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.0100 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.1190 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.6300 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Monoxide

**CAS Number:** 630-08-0

**Test Method:** EPA/OAR Mthd 10

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 0.0194 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 0.1000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide

**CAS Number:** 124-38-9

**Test Method:** EPA/OAR Mthd 3A

Pollutant Group(s): (Acid Gasses/Mist, Greenhouse Gasses (GHG), InOrganic Compounds)

Emission Limit 1: 117.0000 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

POLLUTANT NAME: Methane
CAS Number: 74-82-8

**Test Method:** EPA/OAR Mthd 18

Pollutant Group(s): (Greenhouse Gasses (GHG), Organic Compounds (all), Organic Non-HAP Compounds)

**Emission Limit 1:** 0.0023 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrous Oxide (N2O)

**CAS Number:** 10024-97-2

**Test Method:** EPA/OAR Mthd 320

Pollutant Group(s): (Greenhouse Gasses (GHG), InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0006 LB/MMBTU AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Carbon Dioxide Equivalent (CO2e)

CAS Number: CO2e
Test Method: Other

Other Test Method: recordkeeping

**Pollutant Group(s):** (Greenhouse Gasses (GHG))

**Emission Limit 1:** 638.0000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) good combustion practices

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

PROCESS NAME: Urea Granulator

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 1500.00 metric tons/day

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 0.1000 KG/METRIC TON AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 60.4000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Wet Scrubber

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1000 KG/METRIC TON AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2:** 60.4000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Wet Scrubber

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0250 KG/METRIC TON AVERAGE OF 3 STACK TEST RUNS

Emission Limit 2: 15.1000 TONS/YR ROLLING 12 MONTH TOTAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) Wet Scrubber

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) wet scrubber

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** Cooling Tower

NAME:

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

Process Notes: There are 2 cooling towers. One has 6 cells with a total flowrate of 74,040 gal/min and the other has 9 cells with a total flowrate of 111,060 gal/min

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

**Control Method:** (A) drift eliminator

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numerical emission limit. The drift eliminator is required to have a control efficiency of 0.0005%.

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu \text{ (TPM10)}$ 

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0005 %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) drift eliminator

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** There is no numerical emission limit. The drift eliminator is required to have a control efficiency of 0.0005%.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) drift eliminator

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu$  (TPM2.5)

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) drift eliminator

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numerical emission limit. The drift eliminator is required to have a control efficiency of 0.0005%.

#### Process/Pollutant Information

**PROCESS NAME:** Granulated Urea Transfer

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 1500.00 metric tons/day

**Process Notes:** There are six (6) different emission points. The transfer points are for the warehouse, train loading, and truck loading.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0050 GR/DSCF AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) bin vent filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The ton/yr limit varies for each of the 6 emission points depending on the flowrate.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0050 GR/DSCF AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) bin vent filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** The ton/yr limit varies for each of the 6 emission points depending on the flowrate.

**POLLUTANT NAME:** Particulate matter, total  $< 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0013 GR/DSCF AVERAGE OF 3 STACK TEST RUNS

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\ \ U$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) bin vent filter

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** The ton/yr limit varies for each of the 6 emission points depending on the flowrate.

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** EPA/OAR Mthd 9

**Pollutant Group(s):** 

**Emission Limit 1:** % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) bin vent filter

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** MDEA storage tank

**Process Type:** 61.999 (Other Agricultural Chemical Manufacturing Sources)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** The storage tank capacity is 390,000 gallons

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** EPA/OAR Mthd 25A

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.1000 TONS/YR ROLLING 12 MONTH TOTAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Nitrogen gas blanket

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** Haul Roads

**Process Type:** 99.140 (Paved Roads)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** There are two (2) paved haul roads. The length of one is 0.97 miles and the other is 1.07 miles long.

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and 202 **Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) paved road, water flushing, and sweeping

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permits.

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 201 and 202 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) paved road, water flushing, and sweeping

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** There is no numeric emission limit in the permits.

**POLLUTANT NAME:** Particulate matter, total  $\leq 2.5 \mu \text{ (TPM2.5)}$ 

CAS Number: PM

**Test Method:** EPA/OAR OTM 27 and 28 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) paved road, water flushing, and sweeping

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** There are no numeric emission limits in the permits.

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

**Test Method:** EPA/OAR Mthd 22

**Pollutant Group(s):** 

**Emission Limit 1:** % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) paved road, water flushing, and sweeping

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

## Facility Information

RBLC ID: LA-0264 (final) Date Determination

Corporate/Company Name: AIR PRODUCTS AND CHEMICALS, INC. Permit Number: PSD-LA-750(M1)

Facility Name: NORCO HYDROGEN PLANT Permit Date: 09/04/2012 (actual)

Last Updated:

09/06/2013

Facility Contact: DAN DILLER 5042541590 DILLERDJ@AIRPRODUCTS.COM FRS Number: 110000597140

Facility Description: A new hydrogen plant (SMR) which was previously propoposed by Valero SIC Code: 2813

(LA-0245)

Permit Type: A: New/Greenfield Facility NAICS Code: 325120

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

**Facility County:** ST. CHARLES

Facility State: LA

**Facility ZIP Code:** 70079

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Permit Writer: Dan Nguyen

**Permit Notes:** 

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 82.4300 (Tons/Year)
Nitrogen Oxides (NOx) 80.9600 (Tons/Year)
Particulate Matter (PM) 44.4700 (Tons/Year)
Sulfur Oxides (SOx) 3.3100 (Tons/Year)
Volatile Organic Compounds (VOC) 30.6200 (Tons/Year)

## Process/Pollutant Information

**PROCESS NAME:** Reformer

**Process Type:** 11.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: fuel gas

**Throughput:** 1320.00 MMBTU/H

Process Notes: Supplement fuel: natural gas

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** EPA/OAR Mthd 7E

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 48.7400 LB/H HOURLY MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 0.0150 LB/MMBTU ANNUAL AVERAGE

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) Ultra Low NOx Burners (ULNB) and SCR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

**Test Method:** EPA/OAR Mthd 5 and OTM 28 **Pollutant Group(s):** (Particulate Matter (PM))

Emission Limit 1: 11.2400 LB/H HOURLY AVERAGE

**Emission Limit 2:** 

**Standard Emission:** 0.0075 LB/MMBTU

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Proper equipment designs, good combustion practices, and gaseous fuel

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** PM = PM10 = PM2.5

## Process/Pollutant Information

**PROCESS NAME:** Flare (EQT0003)

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: natural gas

**Throughput:** 0.31 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0300 LB/H HOURLY MAXIMUM Emission Limit 2: 0.0900 T/YR ANNUAL MAXIMUM

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Proper Equipment designs and good combustion practices

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0100 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Maintain minimum heat content of the flare gas at 200 btu/scf to ensure the flame at the flare tips at all the

times.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** 

Cooling Tower (EQT0004)

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

Throughput: 11200.00 GAL/MIN

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total (TPM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.7800 LB/H HOURLY MAXIMUM

**Emission Limit 2:** 

**Standard Emission:** 0.0010 PERCENT DRIFT RATE MAXIMUM

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Drift eliminators

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** PM = PM10 = PM2.5

# **Facility Information**

RBLC ID: LA-0244 (final) Date Determination

LA-0244 (final)

Last Updated:

07/06/2011

Corporate/Company Name: SASOL NORTH AMERICA, INC. Permit Number: PSD-LA-291(M3)

Facility Name: LAKE CHARLES CHEMICAL COMPLEX - LAB UNIT Permit Date: 11/29/2010 (actual)

Facility Contact: MAGGIE PAGELS 337-494-5769 MARGARET.PAGELS@US.SASOL.COM FRS Number: 110017418061

Facility Description: Chemical Production Unit for Linear Alkyl Benzene (LAB)production. SIC Code: 2869

**Permit Type:** C: Modify process at existing facility **NAICS Code:** 325110

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

Facility County: CALCASIEU

Facility State: LA

Facility ZIP Code: 70669

Permit Issued By: LOUISIANA DEPARTMENT OF ENV QUALITY (Agency Name)

MR. BRYAN D. JOHNSTON(Agency Contact) (225)219-3450 BRYAN.JOHNSTON@LA.GOV

Other Agency Contact Info: Permit Writer: Dan Nguyen (225) 219-3395

**Permit Notes:** Modification to an existing PSD Permit (PSD-LA-291(M2), dated October 18, 1988) to increase operating time of the heater. Emissions

will not be increased above the permitted limits. Existing BACT will not be revised.

#### Process/Pollutant Information

PROCESS NAME: EQT0026 - LAB Unit Flare LF-1

Process Type: 19.310 (Chemical Plant Flares)

Primary Fuel: Natural Gas

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 10.2300 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Steam Assisted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3700 LB/H HOURLY MAXIMUM

**Emission Limit 2:** % OPACITY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) Steam assisted

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

#### Process/Pollutant Information

**PROCESS NAME:** EQT0027 - PACOL CHARGE HEATER H-201

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: Natural Gas

**Throughput:** 87.30 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 7.1500 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) Low NOX Burners

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.8600 LB/H HOURLY MAXIMUM

**Emission Limit 2:** % OPACITY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

## Process/Pollutant Information

**PROCESS NAME:** EQT0028 - PACOL STARTUP HEATER H-202

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

Primary Fuel: natural gas

**Throughput:** 21.00 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $\leq 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2100 LB/H HOURLY MAXIMUM

**Emission Limit 2:** % OPACITY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) No additional Control

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 2.7100 LB/H HOURLY MAXIMUM

**Emission Limit 2:** % OPACITY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) low nox burners

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

Process/Pollutant Information

**PROCESS NAME:** EQT0029 - Hot Oil Heater H-601

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** natural gas

**Throughput:** 170.00 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Particulate matter, total  $< 10 \mu$  (TPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.7100 LB/H HOURLY MAXIMUM

**Emission Limit 2:** % OPACITY

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) No additional control

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 19.6900 LB/H HOURLY MAXIMUM

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (P) low nox burners

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** BACT was determined in 1983

# **Facility Information**

RBLC ID: TX-0575 (final)

**Determination** 

SIC Code:

**Last Updated:** 05/12/2016

**Permit** 41945,

Corporate/Company SABINA PETROCHEMICALS LLC
Name:

Number: N018M1

Facility Name: SABINA PETROCHEMICALS LLC

**Permit Date:** 08/20/2010

(actual)

2869

Facility Contact: 4099605000 CHRISTOPHER.WITTE@BASF.COM

FRS Number: 110006134691

Facility Description: C4 OLEFINS COMPLEX BRIEF PLANT DESCRIPTION/NARRATIVE (FOR EXAMPLE - CHEMICAL

PLANT, STEEL MILL, PAINT MANUFACTURING, ETC.): C4 OLEFINS COMPLEX BRIEF EMISSION SOURCE(S) DESCRIPTION (FOR EXAMPLE - BOILER, PAINT SPRAY BOOTH, FURNACE, ETC.): STORM WATER TANK, COOLING TOWER, FUGITIVES, TANK TRUCK LOADING, AND ABOILER, TYPE(S) OF FUEL USED AT THIS FACILITY: DESCRIPTION OF THE POLLUTION ABATEMENT STRATEGY (FOR EXAMPLE - FABRIC FILTER, ESP, CARBON ADSORBERS, POWDER COATINGS, ETC.): HIGH AND LOW-PRESSURE FLARES, AND AN AMMONIA SCRUBBER FACILITY NOTES: THE FACILITY INCLUDES A BUTADIENE UNIT WITH A MAXIMUM CAPACITY OF 1 BILLION POUNDS PER YEAR OF BUTADIENE, AN ALKYLATE (MIXTURE OF OCTANES) UNIT (REFERRED TO AS INALK UNIT) WITH A MAXIMUM CAPACITY OF 1 BILLION POUNDS PER YEAR OF ALKYLATE,

AND ANCILLARY SUPPORT EQUIPMENT.

Permit Type: A: New/Greenfield Facility NAICS Code: 325199

**Permit URL:** 

EPA Region: 6 COUNTRY: USA

**Facility County:** JEFFERSON

**Facility State:** TX

**Facility ZIP Code:** 

**Permit Issued By:** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (TCEQ) (Agency Name)

MICHAEL PARTEE(Agency Contact) (512) 239-3312 michael.partee@tceq.texas.gov

Other Agency AGENCY CONTACT: DANIEL A. SMOTHERS TELEPHONE NUMBER: (512) 239-1664 FAX:

E-MAIL ADDRESS:DSMOTHER@TCEQ.STATE.TX.US ADDRESS: OFFICE OF PERMITTING AND REGISTRATION

AIR PERMITS DIVISION, MC-163, P.O. BOX 13087 CITY: AUSTIN STATE: TEXAS ZIP CODE: 78711-3087

Permit Notes: BRIEF PLANT DESCRIPTION/NARRATIVE (FOR EXAMPLE - CHEMICAL PLANT, STEEL MILL, PAINT MANUFACTURING, ETC.):

C4 OLEFINS COMPLEX BRIEF EMISSION SOURCE(S) DESCRIPTION (FOR EXAMPLE - BOILER, PAINT SPRAY BOOTH, FURNACE, ETC.): STORM WATER TANK, COOLING TOWER, FUGITIVES, TANK TRUCK LOADING, AND ABOILER, TYPE(S) OF FUEL USED AT THIS FACILITY: DESCRIPTION OF THE POLLUTION ABATEMENT STRATEGY (FOR EXAMPLE - FABRIC FILTER, ESP, CARBON ADSORBERS, POWDER COATINGS, ETC.): HIGH AND LOW-PRESSURE FLARES, AND AN AMMONIA SCRUBBER FACILITY NOTES: THE FACILITY INCLUDES A BUTADIENE UNIT WITH A MAXIMUM CAPACITY OF 1 BILLION POUNDS PER

YEAR OF BUTADIENE, AN ALKYLATE (MIXTURE OF OCTANES) UNIT (REFERRED TO AS INALK UNIT) WITH A MAXIMUM

CAPACITY OF 1 BILLION POUNDS PER YEAR OF ALKYLATE, AND ANCILLARY SUPPORT EQUIPMENT.

Affected Boundary Type: Class 1 Area State: Boundary: Distance: CLASS1 AL Sipsey > 250 km

Facility-wide Pollutant Name: Facility-wide Emissions Increase:

Emissions: Nitrogen Oxides (NOx) 9.0700 (Tons/Year)
Volatile Organic Compounds (VOC) 10.3300 (Tons/Year)

#### Process/Pollutant Information

**PROCESS** HIGH AND LOW PRESSURE FLARES

NAME:

**Process** 19.310 (Chemical Plant Flares)

Type:

**Primary** NATURAL GAS

**Fuel:** 

**Throughput:** 1600.00 T/YR

Process THE NOX EMISSIONS INCREASES FROM THE FLARES ARE DUE TO THE COMBUSTION OF NATURAL GAS USED AS SWEEP GAS IN

Notes: THE FLARE HEADER SYSTEM. THE NATURAL GAS ALSO HELPS TO MAINTAIN THE MINIMUM HEATING VALUE NECESSARY TO

ENSURE DESTRUCTION OF THE VOCS IN THE VENT STREAMS. THE NATURAL GAS FLOW WAS NOT COMPLETELY ACCOUNTED FOR IN THE ORIGINAL PERMIT REPRESENTATIONS AND IS BEING ADDED TO THE PERMIT AT THIS TIME. THERE IS NO APPLICABLE POST-COMBUSTION TECHNOLOGY TO REDUCE NOX EMISSIONS FROM FLARES. EMISSIONS ARE MINIMIZED BY PROPER OPERATION OF THE FLARES, INCLUDING COMPLIANCE WITH THE APPLICABLE PROVISIONS IN SECTION 60.18 OF SUBPART A OF THE FEDERAL NEW SOURCE PERFORMANCE STANDARDS (NSPS) IN 40 CFR PART 60 AND THE PROVISIONS OF SPECIAL CONDITION 13 OF PERMIT 41945. SPECIAL CONDITION 13 REQUIRES THE FLARES TO BE OPERATED WITH A FLAME PRESENT AT ALL TIMES, MONITORING TO ENSURE THE PRESENCE OF A CONSTANT PILOT FLAME, NO VISIBLE EMISSIONS, AND CONTINUOUS FLOW RATE

AND BTU CONTENT MONITORING OF THE FLARED STREAMS. THESE OPERATING REQUIREMENTS WERE DETERMINED TO SATISFY LAER IN THE ORIGINAL PERMITTING OF THE FLARES, AND THERE HAVE BEEN NO CHANGES IN FLARE TECHNOLOGY

# SINCE THAT TIME THAT WOULD FURTHER IMPROVE FLARE OPERATION. THE FLARES WILL CONTINUE TO OPERATE IN COMPLIANCE WITH THESE CONDITIONS; THEREFORE, THE LAER REQUIREMENT WILL BE MET.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 9.0700 T/YR ANNUAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

**Control Method:** (N)

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Yes

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.3200 T/YR ANNUAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: LAER

Other Applicable Requirements:

Control Method: (A) FLARE
Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton

**Compliance Verified:** Yes

#### **Pollutant/Compliance Notes:**

#### Process/Pollutant Information

**PROCESS** ALKFUG, BDEFUG, AND UTILFUG

NAME:

**Process** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

Type: Primary

**Fuel:** 

**Throughput:** 0

Process THE INCREASE IN VOC EMISSIONS FROM THE PROCESS FUGITIVE EPNS (ALKFUG, BDEFUG, AND UTILFUG) ARE THE RESULT OF A

Notes: CORRECTION TO THE UNDERESTIMATED COMPONENT COUNTS. THE COMPONENTS ARE CURRENTLY INCLUDED IN SABINA'S

LEAK DETECTION AND REPAIR (LDAR) DATABASE AND ARE MONITORED IN ACCORDANCE WITH THE SAME 28LAER LDAR PROGRAM REQUIRED FOR THE COMPONENTS THAT ARE CURRENTLY AUTHORIZED BY THE PERMIT. AS THE NAME IMPLIES, 28LAER WAS SPECIFICALLY DEVELOPED BY TCEQ TO SATISFY THE LAER REQUIREMENT FOR FUGITIVE EMISSIONS THAT ARE SUBJECT TO NNSR. SPECIAL CONDITION 9 OF THE DRAFT CONDITIONS FOR THIS PERMIT AMENDMENT CONTAINS TCEQ'S MOST CURRENT 28LAER LDAR LANGUAGE; THEREFORE, IT REPRESENTS CURRENT LAER REQUIREMENTS. IN ADDITION TO THE STANDARD 28LAER REQUIREMENT, SPECIAL CONDITION 10 OF THE PERMIT REQUIRES FLANGES AND CONNECTORS IN GAS/VAPOR AND LIGHT LIQUID SERVICE TO BE MONITORED QUARTERLY IN ACCORDANCE WITH THE SAME REQUIREMENTS SPECIFIED IN SPECIAL CONDITION 9 FOR VALVES. BECAUSE THE ADDITIONAL COMPONENTS ARE ALSO MONITORED IN ACCORDANCE WITH THESE SAME REQUIREMENTS AND WILL CONTINUE TO BE AS SPECIFIED IN THE PERMIT, THE LAER

REQUIREMENT IS MET.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 9.0100 T/YR ANNUAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

Control Method: (P) THE FACILITY UTILIZES THE LOWEST ACHEIVABLE EMISSION RATE (LAER) LDAR (LEAK

DETECTION AND REPAIR) PROGRAM.

**Est. % Efficiency:** 98.000

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** STORMWATER TANK

NAME:

**Process** 64.006 (Wastewater Collection & Treatment)

Type:

**Primary** N/A

**Fuel:** 

**Throughput:** 15.00 MGAL/YR

Process THERE IS A SMALL INCREASE, 0.31 TPY, IN THE ALLOWABLE VOC EMISSIONS FROM THE STORMWATER TANK (TK-9804) DUE TO

**Notes:** A CHANGE IN THE EMISSION CALCULATION METHOD THAT IS MORE APPLICABLE TO THE TANK AND ITS CONTENTS THAN THE

CALCULATION ORIGINALLY USED FOR THE TANK. THE TANK IS EQUIPPED WITH AN EXTERNAL FLOATING ROOF WITH A MECHANICAL PRIMARY SEAL AND A RIM-MOUNTED SECONDARY SEAL TO CONTROL VOC EMISSIONS. THIS LEVEL OF EMISSIONS CONTROL IS THE MOST STRINGENT CONTROL KNOWN TO BE USED FOR STORAGE OF STORMWATER CONTAINING

TRACE AMOUNTS OF VOC AND IS THEREFORE CONSIDERED TO BE LAER

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

**Test Method:** Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 0.3100 T/YR ANNUAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

**Control Method:** (A) EXTERNAL FLOATING ROOF

Est. % Efficiency: 88.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

#### **Pollutant/Compliance Notes:**

#### Process/Pollutant Information

**PROCESS** BOILER

NAME:

**Process Type:** 13.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** NATURAL GAS

**Throughput:** 228.00 SCF/H

Process Notes: THE BOILER, EPN BLR, HAS SCR WITH LOW NOX BURNERS, A NOX LONG-TERM EMISSION FACTOR OF 0.007 LB NOX /MMBTU

AND A SHORT-TERM EMISSION FACTOR OF 0.020 LB NOX /MMBTU TO ACCOMMODATE FOR HOT STANDBY. BECAUSE OF THE

LOW ANNUAL EMISSION FACTOR, THIS WAS ACCEPTED AS LAER.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 0.0200 LB/MMBTU HOURLY
Emission Limit 2: 0.0070 LB/MMBTU ANNUAL

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: LAER

**Other Applicable Requirements:** 

Control Method: (A) LOW NOX BURNERS AND SCR

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS** COOLING TOWER

NAME:

**Process Type:** 50.007 (Petroleum Refining Equipment Leaks/Fugitive Emissions)

**Primary Fuel:** N/A

**Throughput:** 73000.00 GAL/MIN

Process Notes: THE COOLING TOWER, EPN CT, HAS A NON-CONTACT DESIGN, UTILIZES MONTHLY MONITORING OF VOC IN WATER PER

APPENDIX P OR APPROVED EQUIVALENT AND IDENTIFIED LEAKS ARE REPAIRED AS SOON AS POSSIBLE, BUT BEFORE NEXT

SCHEDULED SHUTDOWN.

**POLLUTANT NAME:** Volatile Organic Compounds (VOC)

CAS Number: VOC

Test Method: Unspecified

**Pollutant Group(s):** (Volatile Organic Compounds (VOC))

**Emission Limit 1:** 13.4300 T/YR ANNUAL

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) THE COOLING TOWER, EPN CT, HAS A NON-CONTACT DESIGN, UTILIZES MONTHLY

MONITORING OF VOC IN WATER PER APPENDIX P OR APPROVED EQUIVALENT AND IDENTIFIED LEAKS ARE REPAIRED AS SOON AS POSSIBLE, BUT BEFORE NEXT SCHEDULED SHUTDOWN.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: AL-0249 (final) Date Determination

**Last Updated:** 08/17/2010

Corporate/Company Name: EVONIK DEGUSSA CORPORATION Permit Number: X001, X008, X043, X125

Facility Name: EVONIK DEGUSSA CORPORATION Permit Date: 01/07/2010 (actual)

Facility Contact: 2514434763 BILL.KLUTZ@EVONIK.COM FRS Number: 110017408296

Facility Description: CHEMICAL MANUFACTURING FACILITY SIC Code: 2869

Permit Type: A: New/Greenfield Facility NAICS Code: 11

**Permit URL:** 

EPA Region: 4 COUNTRY: USA

**Facility County:** MOBILE

Facility State: AL

**Facility ZIP Code:** 

Permit Issued By: ALABAMA DEPT OF ENVIRONMENTAL MGMT (Agency Name)

MR. DALE HURST(Agency Contact) (334) 271-7882 ADH@ADEM.STATE.AL.US

**Permit Notes:** 

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Nitrogen Oxides (NOx) 463.1000 (Tons/Year)
Particulate Matter (PM) 21.9000 (Tons/Year)

#### Process/Pollutant Information

**PROCESS NAME:** METHIONINE PRODUCTION UNIT - THERMAL OXIDIZER

**Process Type:** 64.999 (Other SOCMI Processes)

Primary Fuel: NATURAL GAS

**Throughput:** 62.40 MMBTU/H

Process Notes: EXPANDING METHIONINE PRODUCTION

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.4900 LB/H
Emission Limit 2: 0.0260 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.4900 LB/H
Emission Limit 2: 0.0260 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 16.0700 LB/H

**Emission Limit 2:** 360.0000 PPM @ 3% O2

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) THERMAL OXIDIZER - SNCR

Est. % Efficiency: 64.800
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.4900 LB/H
Emission Limit 2: 0.0260 G/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** METHIONINE PRODUCTION UNIT - CEILCOTE SCRUBBER A

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3700 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3700 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3700 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

#### Process/Pollutant Information

**PROCESS NAME:** METHIONINE PRODUCTION UNIT - CEILCOTE SCRUBBER B

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3700 LB/H

**Emission Limit 2:** 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3700 LB/H

**Emission Limit 2:** 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

#### **Pollutant/Compliance Notes:**

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3700 LB/H

**Emission Limit 2:** 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** METHIONINE PRODUCTION UNIT - CEILCOTE SCRUBBER C

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.5500 LB/H

**Emission Limit 2:** 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5500 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu (FPM2.5)$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.5500 LB/H

**Emission Limit 2:** 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** METHIONINE PRODUCTION UNIT - CEILCOTE SCRUBBER D

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

**Throughput:** 0

#### **Process Notes:**

**POLLUTANT NAME:** Visible Emissions (VE) **CAS Number:** VE Unspecified **Test Method: Pollutant Group(s):** 10.0000 % OPACITY **Emission Limit 1: Emission Limit 2: Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown **BACT-PSD Case-by-Case Basis:** Other Applicable Requirements: **Control Method:** (A) PACKED BED SCRUBBER Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown **Pollutant/Compliance Notes: POLLUTANT NAME:** Particulate Matter (PM) **CAS Number:** PM **Test Method:** Unspecified **Pollutant Group(s):** (Particulate Matter (PM)) 0.5500 LB/H **Emission Limit 1: Emission Limit 2:** 0.0023 GR/DSCF **Standard Emission:** Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown **Case-by-Case Basis: BACT-PSD Other Applicable Requirements: Control Method:** (A) PACKED BED SCRUBBER Est. % Efficiency: **Cost Effectiveness:** 0 \$/ton 0 \$/ton **Incremental Cost Effectiveness:** 

**Pollutant/Compliance Notes:** 

Unknown

**Compliance Verified:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5500 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.5500 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

### Process/Pollutant Information

**PROCESS NAME:** METHIONINE PRODUCTION UNIT - CEILCOTE SCRUBBER E

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3700 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3700 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3700 LB/H
Emission Limit 2: 0.0023 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) PACKED BED SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** EXISTING HCN PRODUCTION UNIT - WASTE HEAT BOILER

Process Type: 12.300 (Gaseous Fuel & Gaseous Fuel Mixtures (>100 million BTU/H & ¿250 million Btu/H))

Primary Fuel: NATURAL GAS

**Throughput:** 212.60 MMBTU/H

**Process Notes:** HCN PRODUCTION UNIT WASTE HEAT BOILER

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 59.1000 LB/H

**Emission Limit 2:** 243.0000 PPM @ 3% 02

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) SNCR
Est. % Efficiency: 60.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.5800 LB/H
Emission Limit 2: 0.0050 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.5800 LB/H
Emission Limit 2: 0.0050 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 1.5800 LB/H
Emission Limit 2: 0.0050 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

### Process/Pollutant Information

**PROCESS NAME:** HCN PRODUCTION UNIT - FLARE A1

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

Process Notes: HCN PRODUCTION UNIT EMERGENCY FLARE - A1

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq$  2.5  $\mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 14.2900 LB/H ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 63.11(B) SEE NOTES

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

### Process/Pollutant Information

**PROCESS NAME:** HCN PRODUCTION UNIT - FLARE A2

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** HCN PRODUCTION UNIT EMERGENCY FLARE A2

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 14.2900 LB/H ANNUAL AVERAGE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0700 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 63.11(B) SEE NOTES

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

### Process/Pollutant Information

**PROCESS NAME:** HCN PRODUCTION UNIT - TANK FARM FLARE - A5

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** HCN PRODUCTION UNIT TANK FARM FLARE A5

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 1.7900 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0160 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0160 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0160 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

**Test Method:** Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 63.11(B) SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

# Process/Pollutant Information

PROCESS NAME: AMSUL PRODUCTION UNIT - DUST SCRUBBER - A10

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.2400 LB/H

**Emission Limit 2:** 0.0145 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency: 85.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu \text{ (FPM10)}$ 

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2400 LB/H
Emission Limit 2: 0.0145 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency: 85.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.2400 LB/H
Emission Limit 2: 0.0145 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency: 85.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

**CAS Number:** VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**PROCESS NAME:** ACROLEIN PRODUCTION UNIT - THERMAL OXIDIZER

**Process Type:** 64.999 (Other SOCMI Processes)

Primary Fuel: NATURAL GAS
Throughput: 77.44 MMBTU/H

**Process Notes:** ACROLEIN PRODUCTION UNIT THERMAL OXIDIZER

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 15.4900 LB/H

**Emission Limit 2:** 61.0000 PPM @ 3% O2

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) LOW NOX BURNERS

Est. % Efficiency: 45.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.8330 LB/H

**Emission Limit 2:** 0.0030 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.8330 LB/H

**Emission Limit 2:** 0.0030 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.8330 LB/H

**Emission Limit 2:** 0.0030 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

PROCESS NAME: ANDRUSSOW HCN PRODUCTION UNIT - THERMAL OXIDIZER / WASTE HEAT BOILER

Process Type: 12.300 (Gaseous Fuel & Gaseous Fuel Mixtures (>100 million BTU/H & ¿250 million Btu/H))

**Primary Fuel:** NATURAL GAS

**Throughput:** 48.30 MMBTU/H

Process Notes: ANDRUSSOW WASTE HEAT BOILER/ THERMAL OXIDIZER

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3600 LB/H
Emission Limit 2: 0.0544 GR/DSCF

Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 2.5 \mu$  (FPM2.5)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3600 LB/H
Emission Limit 2: 0.0544 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 18.3100 LB/H

**Emission Limit 2:** 150.0000 PPM @ 3% O2

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) SNCR
Est. % Efficiency: 60.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.3600 LB/H

**Emission Limit 2:** 0.0544 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

PROCESS NAME: ANDRUSSOW HCN PRODUCTION UNIT - FLARE HCNA - 2

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** 

Throughput: 0

**Process Notes:** ANDRUSSOW FLARE HCNA - 2

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 20.0100 LB/H

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1100 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1100 LB/H

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.1100 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 63.11(B) SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: U

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: MACT

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

# Process/Pollutant Information

**PROCESS NAME:** ANDRUSSOW AMSUL PRODUCTION UNIT DUST SCRUBBER

**Process Type:** 64.999 (Other SOCMI Processes)

**Primary Fuel:** 

**Throughput:** 0

**Process Notes:** ANDRUSSOW DUST SCRUBBER HCNA - 3

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3600 LB/H
Emission Limit 2: 0.0544 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency: 85.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3600 LB/H
Emission Limit 2: 0.0544 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency: 85.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 2.5 \mu$  (FPM2.5)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.3600 LB/H
Emission Limit 2: 0.0544 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency: 85.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Visible Emissions (VE)

CAS Number: VE

Test Method: Unspecified

**Pollutant Group(s):** 

**Emission Limit 1:** 10.0000 % OPACITY

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Unknown

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

**Control Method:** (A) WET SCRUBBER

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# **Facility Information**

RBLC ID: ID-0017 (final)

**Determination Last** 

Updated:

02/05/2010

Corporate/Company SOUTHEAST IDAHO ENERGY, LLC

Permit Number: H

P-2008.0066

Name:

Facility Name: POWER COUNTY ADVANCED ENERGY CENTER

**Permit Date:** 

02/10/2009 (actual)

Facility Contact: TOM HORNYAK 3039534297 T.HORNYAK@REHINC.COM

FRS Number:

UNKNOWN

Facility Description: COAL/PETCOKE GASIFICATION PLANT PRODUCING AMMONIA, UREA, UAN, AND

SIC Code:

2873

ELEMENTAL SULFUR.

**Permit Type:** A: New/Greenfield Facility

**NAICS Code:** 

113210

**Permit URL:** 

**EPA Region:** 10

**COUNTRY:** 

USA

**Facility County:** POWER

Facility State: ID

Facility ZIP Code: 83211

**Permit Issued By:** IDAHO DEPT OF ENVIRONMENTAL QUALITY (Agency Name)

MR. BILL ROGERS(Agency Contact) (208)373-0437 WILLIAM.ROGERS@DEQ.IDAHO.GOV

Permit Notes: FACILITY LOCATION: LAMB WESTON ROAD, AMERICAN FALLS, IDAHO. DESIGNATED FACILITY (FUEL CONVERSION

PLANT AND CHEMICAL PLANT). PSD THRESHOLD IS 100 T/YR. BACT REQ'D FOR PM, PM10, CO, AND NOX.

<b>Affected Boundaries:</b>	<b>Boundary Type:</b>	Class 1 Area State:	Boundary:	Distance:
	CLASS1	WY	Bridger	100km - 50km
	CLASS1	ID	Craters of the Moon	< 100 km
	CLASS1	WY	Fitzpatrick	100km - 50km

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CLASS1	ID	Craters of the Moon	< 100 km
CLASS1	WY	Fitzpatrick	100km - 50km
CLASS1	NV	Jarbridge	100km - 50km
CLASS1	MT	Red Rock Lakes	100km - 50km
CLASS1	ID	Sawtooth	100km - 50km
CLASS1	WY	Teton	100km - 50km
CLASS1	WY	Washakie	100km - 50km
CLASS1	WY	Yellowstone NP	100km - 50km

Facility-wide Emissions: Pollutant Name: Facility-wide Emissions Increase:

Carbon Monoxide 166.0000 (Tons/Year)
Nitrogen Oxides (NOx) 109.0000 (Tons/Year)
Particulate Matter (PM) 60.2000 (Tons/Year)
Sulfur Oxides (SOx) 23.4000 (Tons/Year)
Volatile Organic Compounds (VOC) 5.1000 (Tons/Year)

Process/Pollutant Information

**PROCESS NAME:** ZLDS COOLING TOWER, SRC30

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 985.00 GAL/MIN

Process Notes: ZERO LIQUID DISCHARGE SYSTEM - COOLING WATER FLOW RATE 985 GPM. TDS MAX 50,000 MG/L.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0010 % OF TOTAL CIRC FLOW

**Emission Limit 2:** 0.3000 LB/H **Standard Emission:** 20.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) DRIFT/MIST ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0010 % OF TOTAL CIRC FLOW

**Emission Limit 2:** 0.3000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) DRIFT/MIST ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

PROCESS COAL/PETCOKE RAILCAR UNLOADING & STORAGE, SRC01-SRC07

NAME:

**Process Type:** 90.011 (Coal Handling/Processing/Preparation/Cleaning)

**Primary Fuel:** 

**Throughput:** 5000.00 T/H

Process Notes: ENCLOSED RAILCAR UNLOADING AT NEGATIVE PRESSURE. COVERED CONVEYORS AND ENCLOSED TRANSFER POINTS.

STORAGE IN EUROSILO OR EQUIVALENT. HIGH EFFICIENCY BAGHOUSES (RAILCAR UNLOADING, CONVEYORS, STORAGE SILO

VENTS).

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0900 LB/H
Emission Limit 2: 0.0009 GR/DSCF

**Standard Emission:** 5.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (B) ENCLOSED RAILCAR UNLOADING AT NEGATIVE PRESSURE. COVERED CONVEYORS AND

ENCLOSED TRANSFER POINTS. STORAGE IN EUROSILO OR EQUIVALENT. HIGH EFFICIENCY

BAGHOUSES (RAILCAR UNLOADING, CONVEYORS, STORAGE SILO VENTS).

Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: PMT LIMIT IS IN LB/H (APPROX. EQUIV TO GRAIN LOADING SHOWN AS EMISSION LIMIT 2).

NSPS SUBPART Y: CURRENT OPACITY=20%, 2008 PROPOSED= 5%.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** (Particulate Matter (PM))

**Emission Limit 1:** 0.0400 LB/H

**Emission Limit 2:** 0.0004 GR/DSCF

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) ENCLOSED RAILCAR UNLOADING AT NEGATIVE PRESSURE. COVERED CONVEYORS AND

ENCLOSED TRANSFER POINTS. STORAGE IN EUROSILO OR EQUIVALENT. HIGH EFFICIENCY

BAGHOUSES (RAILCAR UNLOADING, CONVEYORS, STORAGE SILO VENTS).

Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

PMT LIMIT IS IN LB/H (APPROX. EQUIV TO GRAIN LOADING SHOWN AS EMISSION LIMIT 2).

### Process/Pollutant Information

PROCESS NAME: COAL/PETCOKE RECLAIM TO ROD MILL, SRC08-SRC12

**Process Type:** 90.011 (Coal Handling/Processing/Preparation/Cleaning)

**Primary Fuel:** 

**Throughput:** 105.00 T/H

Process Notes: COVERED CONVEYORS WITH ENCLOSED TRANSFER POINTS, CAPACITY IS 105 T/H FOR EACH CONVEYOR.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0020 LB/H

**Emission Limit 2:** GR/DSCF SEE NOTE

Standard Emission: 5.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (B) COVERED CONVEYORS WITH ENCLOSED TRANSFER POINTS. HIGH EFFICIENCY

BAGHOUSES.

Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

PMT LIMIT IS IN LB/H (APPROX EQUIV TO GRAIN LOADING SHOWN AS EMISSION LIMIT 2). NSPS

SUBPART Y: CURRENT OPACITY=20%, 2008 PROPOSED= 5%.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0010 LB/H

**Emission Limit 2:** GR/DSCF SEE NOTE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (B) COVERED CONVEYORS WITH ENCLOSED TRANSFER POINTS. HIGH EFFICIENCY

BAGHOUSES.

Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

PMT LIMIT IS IN LB/H (APPROX EQUIV TO GRAIN LOADING SHOWN AS EMISSION LIMIT 2).

## Process/Pollutant Information

**PROCESS NAME:** FLUXANT TRUCK LDOUT & CONVEYING, FUG

**Process Type:** 90.019 (Lime/Limestone Handling/Kilns/Storage/Manufacturing)

**Primary Fuel:** 

**Throughput:** 250.00 T/H

Process Notes: GASIFIER FLUXANT VARIES, BUT MAY INCLUDE LIMESTONE, IRON ORE OR SAND.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 20.0000 %

Emission Limit 2:

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) COVERED CONVEYORS AND ENCLOSED TRANSFER POINTS. FUGITIVE DUST BMPS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) COVERED CONVEYORS AND ENCLOSED TRANSFER POINTS. FUGITIVE DUST BMPS.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

### Process/Pollutant Information

**PROCESS** FLUXANT STORAGE, SRCXX

NAME:

**Process Type:** 90.019 (Lime/Limestone Handling/Kilns/Storage/Manufacturing)

**Primary Fuel:** 

**Throughput:** 250.00 T/H

Process Notes: GASIFIER FLUXANT VARIES, BUT MAY INCLUDE LIMESTONE, IRON ORE, OR SAND. MAX FILL RATE PRESUMED TO BE 250 T/H.

MAX USE RATE IN GASIFIER IS 250 T/D.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0020 LB/H
Emission Limit 2: LB/T SEE NOTE

**Standard Emission:** 20.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY BAGHOUSE(S) ON STORAGE SILO VENT(S)

Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: PMT LIMIT IS LB/H (EQUIVALENT LB/T LIMIT IS SHOWN AS EMISSION LIMIT 2), BASED ON 250

T/H FILL RATE.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0020 LB/H

**Emission Limit 2:** LB/T SEE NOTE

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (A) HIGH EFFICIENCY BAGHOUSE(S) ON STORAGE SILO VENT(S)

Est. % Efficiency: 99.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: PMT LIMIT IS LB/H (EQUIVALENT LB/T LIMIT IS SHOWN AS EMISSION LIMIT 2), BASED ON 250

T/H FILL RATE.

### Process/Pollutant Information

**PROCESS NAME:** SLAG HAND, FUG

**Process Type:** 99.190 (Other Fugitive Dust Sources)

**Primary Fuel:** 

**Throughput:** 580.00 T/D

**Process Notes:** GASIFIER SLAG IS WET WHEN CONVEYED TO STORAGE.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 20.0000 %

**Emission Limit 2:** 

**Standard Emission:** %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) STORAGE IN 3-SIDED BUNKER. FUGITIVE DUST BMPS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N) STORAGE IN 3-SIDED BUNKER. FUGITIVE DUST BMPS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

# Process/Pollutant Information

**PROCESS NAME:** LEAKS - SYNGAS PIPING OR VALVES, CO FUG

**Process Type:** 64.002 (Equipment Leaks (valves, compressors, pumps, etc.))

**Primary Fuel:** 

Throughput:

**Process Notes:** HIGH CO CONCENTRATION IN SYNGAS FROM GASIFIER TO FINAL CO-SHIFT REACTOR.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N) FUGITIVE CO BMPS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

## Process/Pollutant Information

**PROCESS NAME:** ASU REGEN HEATER, 0.1 MMBTU/H, SRC13

**Process Type:** 19.600 (Misc. Boilers, Furnaces, Heaters)

**Primary Fuel:** NAT GAS

**Throughput:** 0.10 MMBTU/H

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

**Test Method:** Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 20.0000 %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

### Process/Pollutant Information

PROCESS GASIFIER HEATERS (2), 25 MMBTU/H, SRC14 & SRC15

NAME:

**Process Type:** 19.600 (Misc. Boilers, Furnaces, Heaters)

**Primary Fuel:** NAT GAS

**Throughput:** 25.00 MMBTU/H

**Process Notes:** BOTH HEATERS AT APPROX 25 MMBTU/H FOR STARTUP. NORMAL OPS ONE HEATER OFF, ONE ON STANDBY AT 9 MMBTU/H.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 20.0000 %

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (N) GOOD COMBUSTION PRACTICES.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAIILABLE

# Process/Pollutant Information

**PROCESS** GASIFIER FLARE, SRC16

NAME:

**Process Type:** 19.310 (Chemical Plant Flares)

**Primary Fuel:** SWEET SYNGAS

**Throughput:** 900000.00 LB/H

Process Notes: FLARING DURING STARUP AND UPSETS. SYNGAS CLEANUP PRIOR TO FLARING - GASIFIER QUENCH, SOUR WATER SCRUB,

ACTIVATED CARBON BEDS (MIN 95% HG REMOVAL), AMINE SCRUB (MIN 95% S REMOVAL AS SO2). 1.5 MMBTU/HR NAT GAS

PILOT.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** SEE NOTE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (N) GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) SMOKELESS FLARE. AIR OR STEAM-ASSIST ONLY IF UNASSISTED FLARE PRODUCES

SMOKE. GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NO EMISSION LIMITS AVAILABLE. VE PER 40 CFR 60.18: NO VE AS DETERMINED BY METHOD

22, EXCEPT FOR TOTAL OF 5 MINS IN ANY 2-HR PERIOD. NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) SMOKELESS FLARE. AIR OR STEAM-ASSIST ONLY IF UNASSISTED FLARE PRODUCES

SMOKE. GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) FLARE DESIGNED TO MINIMIZE CO EMISSIONS. GOOD COMBUSTION PRACTICES. MEET 40

CFR 60.18.

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NO EMISSION LIMITS AVAILABLE

# Process/Pollutant Information

**PROCESS NAME:** SELEXOL AGR CO2 VENT, SRC17

**Process Type:** 64.003 (Processes Vents (emissions from air oxidation, distillation, and other reaction vessels))

**Primary Fuel:** 

**Throughput:** 

**Process Notes:** CO2-RICH STREAM FROM ACID GAS REMOVAL (AGR) UNIT.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)

**Emission Limit 1:** 8.7000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions:  $\,N\,$ 

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) THERMAL OXIDIZER (CAT-OX)

**Est. % Efficiency:** 95.000 **Cost Effectiveness:** 0 \$/ton **Incremental Cost Effectiveness:** 0 \$/ton

**Compliance Verified:** Yes

Pollutant/Compliance Notes: TOTAL FLOW 299,585 LB/HR AT 28 F AND 44 PSIG. FLOW IS 98.89% CO2, 0.09% CO.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.9000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES FOR THERMAL OXIDIZER (CAT-OX) USED TO CONTROL CO

EMISSIONS.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: NOX EMISSIONS BASED ON 9 MMBTU/H NAT GAS BURNER ASSOCIATED WITH THE T.O/CAT-OX

### Process/Pollutant Information

**PROCESS NAME:** UREA GRANULATION VENT, SRC19

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 1800.00 T/D

**Process Notes:** 

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0110 LB/T

Emission Limit 2: 20.5000 LB/H Standard Emission: 20.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) WET SCRUBBER IS INTEGRAL PART OF GRANULATION PROCESS, IS PROCESS EQUIPMENT.

DESIGNED FOR MIN 98% CAPTURE AND RECYCLING OF PM/PM10.

Est. % Efficiency:98.000Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:No

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

Emission Limit 1: 0.0050 LB/T Emission Limit 2: 9.0000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) WET SCRUBBER IS INTEGRAL PART OF GRANULATION PROCESS, IS PROCESS EQUIPMENT.

DESIGNED FOR MIN 98% CAPTURE AND RECYCLING OF PM/PM10.

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

**Pollutant/Compliance Notes:** 

### Process/Pollutant Information

**Process Type:** 62.014 (Nitric Acid Plants)

**Primary Fuel:** 

**Throughput:** 575.00 T/D

**Process Notes:** 

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: 50.0000 PPMV Emission Limit 2: 1.1200 LB/T Standard Emission: 10.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (A) SCR, AMMONIA SLIP MAX 10 PPMV (DRY) CONVERTED TO 15% O2.

Est. % Efficiency: 98.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Yes

Pollutant/Compliance Notes: AT 575 T/D OF 57% ACID, PMT LIMIT IS 15.3 LB/H - (100% ACID/57% ACID) X 15.3 X 24 LB/DAY/ 575

TPD = 1.12 LB/TON OF 100% ACID.

### Process/Pollutant Information

**PROCESS** PROCESS FLARE, SRC21

NAME:

Process Type: 19.310 (Chemical Plant Flares)
Primary Fuel: PROCESS & PURGE GASES

**Throughput:** 

Process Notes: PROCESS & PURGE GASES FROM 2000 T/D AMMONIA PLANT AND 2400 T/D UREA PLANT (LIQUID SOLUTION). 1.5 MMBTU/HR

NAT GAS PILOT.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) SMOKELESS FLARE. AIR OR STEAM-ASSIST ONLY IF UNASSISTED FLARE PRODUCES

SMOKE. GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: NO EMISSION LIMITS AVAILABLE. VE PER 40 CFR 60.18: NO VE AS DETERMINED BY METHOD

22, EXCEPT FOR TOTAL OF 5 MINS IN ANY 2-HR PERIOD. NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) SMOKELESS FLARE. AIR OR STEAM-ASSIST ONLY IF UNASSISTED FLARE PRODUCES

SMOKE, GOOD COMBUSTION PRACTICES, MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

### Process/Pollutant Information

**PROCESS NAME:** COOLING TOWER, SRC22

**Process Type:** 99.009 (Industrial Process Cooling Towers)

**Primary Fuel:** 

**Throughput:** 121000.00 GAL/MIN

**Process Notes:** COOLING WATER FLOW RATE 121,000 GPM. TDS MAX 5000 MG/L.

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % OF TOTAL CIRC FLOW

Emission Limit 2: 1.5000 LB/H
Standard Emission: 20.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) DRIFT/MIST ELIMINATORS

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 0.0005 % OF TOTAL CIRC FLOW

Emission Limit 2: 1.5000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

**Control Method:** (A) DRIFT/MIST ELIMINATORS

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

# Process/Pollutant Information

**PROCESS** 250 MMBTU/H PACKAGE BOILER, SRC24

NAME:

**Process Type:** 12.310 (Natural Gas (includes propane and liquefied petroleum gas))

**Primary Fuel:** NAT GAS

**Throughput:** 250.00 MMBTU/H

Process Notes: OPERATED ONLY DURING STARTUP AND SHUTDOWN, RAMPS DOWN/UP AS STEAM SUPERHEATER BOILER RAMPS UP/DOWN.

COMBINED HEAT INPUT BALANCED

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0052 LB/MMBTU

**Emission Limit 2:** 1.3000 LB/H **Standard Emission:** 20.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: LB/MMBTU AND LB/H LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER

COMBINED EMISSIONS.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0052 LB/MMBTU

**Emission Limit 2:** 1.3000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER COMBINED EMISSIONS.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0740 LB/MMBTU
Emission Limit 2: 18.5000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

Pollutant/Compliance Notes: LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER COMBINED EMISSIONS.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0200 LB/MMBTU

**Emission Limit 2:** 5.0000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (B) LOW-NOX BURNER AND FGR

Est. % Efficiency: 95.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER COMBINED EMISSIONS.

# Process/Pollutant Information

**PROCESS** 250 MMBTU/H STEAM SUPERHEATER BOILER, SRC31

NAME:

Process Type: 12.300 (Gaseous Fuel & Gaseous Fuel Mixtures (>100 million BTU/H & ¿250 million Btu/H))

**Primary Fuel:** NAT GAS & PSA TAILGAS

**Throughput:** 250.00 MMBTU/H

Process Notes: OPERATED DURING STEADY-STATE PRODUCTION ON NATURAL GAS AND (HYDROGEN-RICH) PRESSURE SWING ADSORBER

(PSA) TAILGAS. BALANCED WITH PACKAGE BOILER AT STARTUP/SHUTDOWN SO COMBINED HEAT INPUT

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) ) **Emission Limit 1:** 0.0052 LB/MMBTU

**Emission Limit 2:** 1.3000 LB/H

**Standard Emission:** 20.0000 %

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: LB/MMBTU AND LB/H LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER

COMBINED EMISSIONS.

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

Pollutant Group(s): ( Particulate Matter (PM) )
Emission Limit 1: 0.0052 LB/MMBTU

**Emission Limit 2:** 1.3000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: LB/MMBTU AND LB/H LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER

COMBINED EMISSIONS.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds)
Emission Limit 1: 0.0740 LB/MMBTU

**Emission Limit 2:** 18.5000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER COMBINED EMISSIONS.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** 0.0200 LB/MMBTU

Emission Limit 2: 5.0000 LB/H

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (P) LOW-NOX BURNER & SCR, AMMONIA SLIP LIMITED TO 10 PPM (DRY) CORRECTED TO 15%

O2.

Est. % Efficiency: 97.000
Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: No

Pollutant/Compliance Notes: LIMITS APPLY TO PACKAGE BOILER AND STEAM SUPERHEATER COMBINED EMISSIONS.

### Process/Pollutant Information

**PROCESS NAME:** 2 MW EMERGENCY GENERATOR, SRC25

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** ASTM #1, 2, DIESEL

**Throughput:** 2000.00 KW

**Process Notes:** LIMITED TO 100 H/YR FOR ROUTINE TESTING AND MAINTENANCE

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: N

Case-by-Case Basis: BACT-PSD
Other Applicable Requirements: NSPS, NSPS

Control Method: (P) ULSD FUEL, GOOD COMBUSTION PRACTICES, EPA CERTIFIED PER NSPS IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: VE PER NSPS SUBPART IIII. NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate matter, filterable  $< 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements:

Control Method: (P) ULSD FUEL, GOOD COMBUSTION PRACTICES, EPA CERTIFIED PER NSPS IIII

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES. EPA CERTIFIED PER NSPS IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

Emission Limit 1: Emission Limit 2: Standard Emission:

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES. EPA CERTIFIED PER NSPS IIII

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

**Incremental Cost Effectiveness:** 0 \$/ton **Compliance Verified:** Unknown

**Pollutant/Compliance Notes:** 

## Process/Pollutant Information

**PROCESS NAME:** 500 KW EMERGENCY GENERATOR, FIRE PUMP, SRC26

**Process Type:** 17.110 (Fuel Oil (ASTM # 1,2, includes kerosene, aviation, diesel fuel))

**Primary Fuel:** ASTM #1, 2, DIESEL

**Throughput:** 500.00 KW

**Process Notes:** LIMITED TO 100 H/YR FOR ROUTINE TESTING AND MAINTENANCE

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (P) ULSD FUEL, EPA CERTIFICATION PER NSPS IIII

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** VE PER NSPS SUBPART IIII. NO EMISSION LIMITS AVAILABLE.

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (P) ULSD FUEL, EPA CERTIFICATION PER NSPS IIII

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITSAVAILABLE.

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

Other Applicable Requirements: NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES. EPA CERTIFICATION PER NSPS IIII.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** NO EMISSION KLIMITS AVAILABLE.

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

**CAS Number:** 10102

Test Method: Unspecified

Pollutant Group(s): (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** SEE NOTE

**Emission Limit 2:** 

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** NSPS

Control Method: (N) GOOD COMBUSTION PRACTICES. EPA CERTIFICATION PER NSPS IIII.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

### Process/Pollutant Information

**PROCESS NAME:** AMMONIA STORAGE FLARE, SRC27

**Process Type:** 19.310 (Chemical Plant Flares)

Primary Fuel: AMMONIA

Throughput:

**Process Notes:** 0.75 MMBTU/H NAT GAS PILOT.

**POLLUTANT NAME:** Particulate matter, filterable < 10 μ (FPM10)

**CAS Number:** PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) SMOKELESS FLARE. AIR OR STEAM-ASSIST ONLY IF UNASSISTED FLARE PRODUCES

SMOKE, GOOD COMBUSTION PRACTICES, MEET 40 CFR 60.18.

Est. % Efficiency:

**Cost Effectiveness:** 0 \$/ton

Incremental Cost Effectiveness: 0 \$/ton

Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

**Test Method:** Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) SMOKELESS FLARE. AIR OR STEAM-ASSIST ONLY IF UNASSISTED FLARE PRODUCES

SMOKE. GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

Pollutant/Compliance Notes: VE PER 40 CFR 60.18: NO VE AS DETERMINED BY METHOD 22, EXCEPT FOR TOTAL OF 5 MINS IN

ANY 2-HR PERIOD. NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Carbon Monoxide

CAS Number: 630-08-0
Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds)

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

**POLLUTANT NAME:** Nitrogen Oxides (NOx)

CAS Number: 10102

Test Method: Unspecified

**Pollutant Group(s):** (InOrganic Compounds, Oxides of Nitrogen (NOx), Particulate Matter (PM))

**Emission Limit 1:** SEE NOTE

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) GOOD COMBUSTION PRACTICES. MEET 40 CFR 60.18.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** NO EMISSION LIMITS AVAILABLE

## Process/Pollutant Information

**PROCESS NAME:** AMMONIUM NITRATE NEUTRALIZER VENT, SRC29

**Process Type:** 61.012 (Fertilizer Production (except 61.009))

**Primary Fuel:** 

**Throughput:** 715.00 T/D

Process Notes: AMMONIUM NITRATE/UAN PLANT PRODUCTION ~715 TPD AMMONIUM NITRATE AND ~1600 TPD UAN

**POLLUTANT NAME:** Particulate Matter (PM)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.5000 LB/H **Emission Limit 2:** 20.0000 %

**Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) WET SCRUBBER IS INTEGRAL TO PROCESS. MUST BE DESIGNED TO CAPTURE AND

RECYCLE 90% OF PM/PM10.

Est. % Efficiency:

Cost Effectiveness: 0 \$/ton
Incremental Cost Effectiveness: 0 \$/ton
Compliance Verified: Unknown

**Pollutant/Compliance Notes:** 

**POLLUTANT NAME:** Particulate matter, filterable  $\leq 10 \mu$  (FPM10)

CAS Number: PM

Test Method: Unspecified

**Pollutant Group(s):** ( Particulate Matter (PM) )

**Emission Limit 1:** 1.5000 LB/H

**Emission Limit 2: Standard Emission:** 

Did factors, other then air pollution technology considerations influence the BACT decisions: Y

Case-by-Case Basis: BACT-PSD

**Other Applicable Requirements:** 

Control Method: (N) WET SCRUBBER IS INTEGRAL TO PROCESS. MUST BE DESIGNED TO CAPTURE AND

RECYCLE 90% OF PM/PM10.

Est. % Efficiency:

Cost Effectiveness:0 \$/tonIncremental Cost Effectiveness:0 \$/tonCompliance Verified:Unknown

**Pollutant/Compliance Notes:** 

																		STANDAR	
		CORPORATE_OR_CO		FACILITY_ PERMIT_N	PERMIT_I SSUANCE	DN_LAST_		PROCCESS PRIMARY_TH		4		CAS_NUM	EMISSION LIMIT_1	AVG_TIME_CONDITI CASE-BY-	COMPLIA NCE_VERI EMISSION EMISSION_LIMIT_	EMISSION_LIMIT_2_ 2 AVGERAGE_TIME_C	ION_LIMI ON_LIM	SSI AVERAGE MIT _TIME_CO	
Comments	RBLCID FACILITY_NAME	MPANY_NAME	FACILITY_COUNTY	STATE UM SIC_CODI	_DATE	UPDATED FACILITY_DESCRIPTION	PROCESS_NAME	_TYPE FUEL PU	T PUT_UNIT	50 MMscf/yr Drilling Flare, 35 MMscf/yr	POLLUTANT	BER CONTROL_METHOD_DESCRIPTION	_LIMIT_1 UNIT	ON CASE_BAS	S FIED _LIMIT_2 _UNIT	ONDITION	T _UNIT	NDITION POL	LUTANT_COMPLIANCE_NOTES
	POINT THOMSON PRODUCTION	EXXON MOBIL		AQ1201C			Drilling, HP, and LP			HP Flare- Pilot/Purge, 20 MMscf/yr LP Flare-			LB/MMB1						
LAER 0.068 lb/MMBtu	AK-0082 FACILITY	CORPORATION	USA	AK PT03 138	42027	42419 OIL GAS EXPLORATION AND PRODUCTION FACILITY.	Flares	19.31 Gas	50 MMscf/yr	Pilot/Purge	Nitrogen Oxides (NOx)	10102	0.068 U	BACT-PSD	U 0		0		
						The Kenai Nitrogen Operations Facility is located at Mile 21 of the Kenai Spur Highway, near Kenai Alaska. It is classified as a nitrogenous fertilizer manufacturing facility under Standard Industrial Classification code 2873 and under North American Industrial Classification code 3873 and under North American Industrial Classification code 325311. The facility will produce ammonia and urea for bulk sale.													
	KENAI NITROGEN			AQ0083C		There are two ammonia and two urea plants at Agriumâc**s KNO facility. This permit authorizes the restart of one ammonia and on urea plant (plants 4 and 5). The ammonia plant converts natural gas with added steam and air to produce ammonia (NH3) and carbon dioxide (CO2). Feedstocks for the urea plant include CO2 and NH3. The utility plant generates the power and steam needed to operate the ammonia and urea plants. Final products are loade		Natural	ммвти/	1.25 MMBtu/hr Ammonia Tank Flare, 0.4 MMBtu/hr Emergency Flare, and 1.25 MMBtu/hr		Work Practice Requirements and Limited Use (limit venting to 168 hr/yr each during startup, shutdown, and	LB/ММВТ						
LAER 0.068 lb/MMBtu	AK-0083 OPERATIONS	AGRIUM U.S. INC.	USA		42010	42419 at the Product Loading Wharf for shipment.	Three (3) Flares	19.31 Gas			Nitrogen Oxides (NOx)	10102 maintenance events)	0.068 U	BACT-PSD	U O		0		
	EVONIK DEGUSSA AL-0249 CORPORATION	EVONIK DEGUSSA CORPORATION	MOBILE	X043, AL X125 286	40185	40407 CHEMICAL MANUFACTURING FACILITY	HCN PRODUCTION UNIT - FLARE A1	19.31	0	UNIT EMERGENCY FLARE - A1	Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICES	14.29 LB/H	ANNUAL AVERAGE BACT-PSD	U 0		0		
	EVONIK DEGUSSA AI -0249 CORPORATION	EVONIK DEGUSSA		X001, X008, X043,			HCN PRODUCTION			HCN PRODUCTION UNIT EMERGENCY									
		CORPORATION	MOBILE	AL X125 286 X001, X008,	40185	40407 CHEMICAL MANUFACTURING FACILITY	UNIT - FLARE A2 HCN PRODUCTION	19.31	0	HCN PRODUCTION	Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICES	14.29 LB/H	ANNUAL AVERAGE BACT-PSD	0		0		
	AL-0249 EVONIK DEGUSSA CORPORATION	EVONIK DEGUSSA CORPORATION	MOBILE	X043, AL X125 286 X001,	40185	40407 CHEMICAL MANUFACTURING FACILITY	UNIT - TANK FARM FLARE - AS	19.31	0	UNIT TANK FARM FLARE A5	Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICES	1.79 LB/H	BACT-PSD	0		0		
	EVONIK DEGUSSA AL-0249 CORPORATION	EVONIK DEGUSSA CORPORATION	MOBILE	X008, X043, AL X125 286	40185	40407 CHEMICAL MANUFACTURING FACILITY	ANDRUSSOW HCN PRODUCTION UNIT - FLARE HCNA - 2	19.31	0	ANDRUSSOW FLARE HCNA - 2	Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICES	20.01 LB/H	BACT-PSD	U		0		
	EL DORADO			0573-AOP-		CHEMICAL MANUFACTURING, INCLUDING NITRIC ACID PRODUCTION, SUFLURIC ACID PRODUCTION, AMMONIA	AMMONIA PLANT AMMONIA VENT	NATURAL	ммвти/					ROLLING 3 HOUR		ROLLING 12 MONTH	LB/MM	ROLLING BT 3 HOUR	
see Nox standard reported for flare 0.098	AR-0121 CHEMICAL COMPANI	LSB INDUSTRIES, INC	UNION	AR R16 287	41596	42538 PRODUCTION, AND AMMONIA NITRATE PRODUCTION  CHEMICAL MANUFACTURING, INCLUDING NITRIC ACID PRODUCTION, SUFLURIC ACID PRODUCTION, AMMONIA	FLARE AMMONIA PLANT AMMONIA VENT	19.31 GAS	0.26 H MMBTU/		Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICE	792.03 LB/H LB/MMB1	3046.269 AVERAGE BACT-PSD  ROLLING 3 HOUR	N 6.9 T/YR	AVERAGE	0.098 U	AVERAGE	
	AR-0121 CHEMICAL COMPAN	IY LSB INDUSTRIES, INC	UNION	AR R16 287	41596		FLARE	19.31 GAS	0.26 H		Nitrous Oxide (N2O)	2 GOOD COMBUSTION PRACTICE	0.0002 U	AVERAGE BACT-PSD	N 0		0	ROLLING	
	EL DORADO AR-0121 CHEMICAL COMPAN	IY LSB INDUSTRIES, INC	UNION	0573-AOP- AR R16 287	41596	PRODUCTION, SUFLURIC ACID PRODUCTION, AMMONIA 42538 PRODUCTION, AND AMMONIA NITRATE PRODUCTION	AMMONIA PLANT PROCESS SSM FLARE	NATURAL 19.31 GAS	MMBTU/ 0.05 H		Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICE	0.093 LB/H	ROLLING 3 HOUR 1.86 AVERAGE BACT-PSD	N 0.41 T/YR	ROLLING 12 MONTH AVERAGE	LB/MM 0.098 U	BT 3 HOUR AVERAGE	
see Nox standard reported for flare 0.098 lb/MMBtu	EL DORADO AR-0121 CHEMICAL COMPAN	IY LSB INDUSTRIES, INC	UNION	0573-AOP- AR R16 287	41596	CHEMICAL MANUFACTURING, INCLUDING NITRIC ACID PRODUCTION, SUFLURIC ACID PRODUCTION, AMMONIA 42538 PRODUCTION, AND AMMONIA NITRATE PRODUCTION	AMMONIA PLANT PROCESS SSM FLARE	NATURAL 19.31 GAS	MMBTU/ 0.05 H		Nitrous Oxide (N2O)	10024-97- 2 GOOD COMBUSTION PRACTICE	0.0002 U	ROLLING 3 HOUR AVERAGE BACT-PSD	N O		0		
	EL DORADO	IY LSB INDUSTRIES, INC		0573-AOP- AR R16 287	41596	CHEMICAL MANUFACTURING, INCLUDING NITRIC ACID PRODUCTION, SUFLURIC ACID PRODUCTION, AMMONIA	AMMONIA STORAGE		MMBTU/			GOOD AND EFFICIENT OPERATING		ROLLING 3 HOUR 200.4 AVERAGE BACT-PSD	N 43.88 T/YR	ROLLING 12 MONTH	LB/MM	ROLLING BT 3 HOUR AVERAGE	
see Nox standard reported for flare 0.098	EL DORADO			0573-AOP-		42538 PRODUCTION, AND AMMONIA NITRATE PRODUCTION  CHEMICAL MANUFACTURING, INCLUDING NITRIC ACID PRODUCTION, SUFLURIC ACID PRODUCTION, AMMONIA	AMMONIA STORAGE	19.31 GAS NATURAL	0.05 H MMBTU/			10024-97- GOOD AND EFFICIENT OPERATING	10.02 LB/H LB/MMBT	ROLLING 3 HOUR		AVERAGE	0.098 0	AVERAGE	
lb/MMBtu	IA-0121 CHEMICAL COMPAN IOWA FERTILIZER IA-0105 COMPANY	IOWA FERTILIZER COMPANY	LEE	AR R16 287		42538 PRODUCTION, AND AMMONIA NITRATE PRODUCTION  41499 NITROGENEOUS FERTILIZER MANUFACTURING	FLARE Ammonia Flare	19.31 GAS natural 19.31 gas	0.4 H		Nitrous Oxide (N2O) Nitrous Oxide (N2O)	2 PRACTICES 10024-97- work practice/good combustion practices	0.0002 U 0	AVERAGE BACT-PSD BACT-PSD			0		re is no numeric emission limit he permit.
	IA-0105 IOWA FERTILIZER COMPANY	IOWA FERTILIZER COMPANY	LEE	IA 12-219 287	41208	41499 NITROGENEOUS FERTILIZER MANUFACTURING	Ammonia Flare	natural 19.31 gas	0.4 H		Nitrogen Oxides (NOx)	work practice/good combustion 10102 practices	0	BACT-PSD	U 0		0		re is no numeric emission limit ne permit.
	POWER COUNTY ADVANCED ENERGY ID-0017 CENTER	SOUTHEAST IDAHO ENERGY, LLC	POWER	p. 2008.006 ID 6 287	3 39854	COAL/PETCOKE GASIFICATION PLANT PRODUCING AMMONIA, 40214 UREA, UAN, AND ELEMENTAL SULFUR.	GASIFIER FLARE, SRC16	SWEET 19.31 SYNGAS	900000 LB/H	FLARING DURING STARUP AND UPSETS. SYNGAS CLEANUP PRIOR TO FLARING - GASIFER QUENCH, SOUR WATER SCRUB, ACTIVATED CARBON BEDS (MIN 95% HG REMOVAL), AMINE SCRUB (MIN 95% HG REMOVAL) AS SO2). 1.5 MMBTU/HR NAT GAS PILOT.	Nitrogen Oxides (NOx)	GOOD COMBUSTION PRACTICES. 10102 MEET 40 CFR 60.18.	0	SEE NOTE BACT-PSD	U		0	NO.	EMISSION LIMITS AVAILABLE
	ID-0017 CENTER	SOUTHEAST IDAHO ENERGY, LLC	POWER	P- 2008.006 ID 6 287	3 39854	COAL/PETCOKE GASIFICATION PLANT PRODUCING AMMONIA, 40214 UREA, UAN, AND ELEMENTAL SULFUR.	PROCESS FLARE, SRC21	PROCESS & PURGE 19.31 GASES		PROCESS & PURGE GASES FROM 2000 T/D AMMONIA PLANT AND 2400 T/D UREA PLANT (LIQUID SOLUTION). 1.5 MMBTU/HR NAT GAS PILOT.	Nitrogen Oxides (NOx)	GOOD COMBUSTION PRACTICES.	0	SEE NOTE BACT-PSD	U 0		0	NO	EMISSION LIMITS AVAILABLE
	POWER COUNTY ADVANCED ENERGY ID-0017 CENTER	SOUTHEAST IDAHO ENERGY, LLC	POWER	P- 2008.006 ID 6 287	3 39854	COAL/PETCOKE GASIFICATION PLANT PRODUCING AMMONIA, 40214 UREA, UAN, AND ELEMENTAL SULFUR.	AMMONIA STORAGE FLARE, SRC27	AMMONI 19.31 A		0.75 MMBTU/H NAT GAS PILOT.	Nitrogen Oxides (NOx)	GOOD COMBUSTION PRACTICES.	0	SEE NOTE BACT-PSD	U 0		0	NO	EMISSION LIMITS AVAILABLE
LAER 0.068 lb/MMBtu		R MIDWEST FERTILIZEI	R POSEY	129- 33576- IN 00059 287		42494 A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACILITY		NATURAL 19.31 GAS		SSM VENTING IS LIMITED TO 336 HOURS PER YEAR. HEAT INPUT OF 4 MMBTU/HR IS FOR	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE	LB/MMB1 0.068 U		LB/H, SSM	3-HR AVERAGE	0		
LAER 0.068 lb/MMBtu	MIDWEST FERTILIZER IN-0173 CORPORATION	R MIDWEST FERTILIZES	R POSEY	129- 33576- IN 00059 287	3 41794	42494 A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACILITY	BACK END FLARE	NATURAL 19.31 GAS		SSM VENTING SHALL NOT EXCEEDD 336 HOURS PER YEAR. HEAT INPUT IS PILOT ONLY.	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	LB/MMBT 0.068 U	3-HR AVERAGE BACT-PSD	LB/H, SSM 624.94 VENTING	3-HR AVERAGE	0		

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						017 077											CTANDAD	STANDAR	
		CORPORATE_OR_CO		FACILITY PERMIT N		DATE_DET  I ERMINATI  E ON_LAST_		PROCCESS PRIMARY T	THROUGH THROUGH			CAS NUM	EMISSION LIMIT_1		COMPLIA NCE_VERI EMISSION EMISSION_LIMIT_2		AD_EMISS I	STANDAR D_LIMIT_ D_EMISSI AVERAGE	
Comments	RBLCID FACILITY_NAME					UPDATED FACILITY_DESCRIPTION	PROCESS_NAME	_TYPE FUEL P				BER CONTROL_METHOD_DESCRIPTION	_LIMIT_1 UNIT	ON CASE_BASIS	FIED _LIMIT_2 _UNIT	ONDITION			POLLUTANT_COMPLIANCE_NOTES
										PILOT ONLY. SSM EMISSIONS HAVE									
				129-						SEPARATE LIMITS. SSM VENTING									
LAER 0.068 lb/MMBtu		R MIDWEST FERTILIZER	POSEY	33576- IN 00059	2873 417	94 42494 A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACIL	AMMONIA STORAGE	NATURAL 19.31 GAS	MMBTU/	LIMITED 168 HOURS.	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	0.068 U	. 3-HR AVERAGE BACT-PSD	LB/H, SSM 125 VENTING	3-HR AVERAGE	0		
										HEAT INPUT IS FOR									
										NATURAL GAS PILOT ONLY. SSM									
										EMISSIONS ARE CONTROLLED BY									
				147-						THE FLARE AND ARE LIMITED TO 336									
LAER 0.068 lb/MMBtu	OHIO VALLEY IN-0179 RESOURCES, LLC	OHIO VALLEY RESOURCES, LLC	SPENCER	32322- IN 00062	2873 415	42 42494 NITROGENOUS FERTILIZER PRODUCTION PLANT	FRONT END PROCES	NATURAL 19.31 GAS PILOT		HOURS OF VENTING PER YEAR.	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	LB/MMB1 0.068 U	3-HR AVERAGE BACT-PSD	LB/H, SSM 595.47 VENTING	3-HR AVERAGE	0		SSM VENTING HOURS LIMITED TO 336 PER YEAR.
										HEAT INPUT IS FOR PILOT ONLY. SSM									
										EMISSIONS ARE CONTROLLED BY									
	OHIO VALLEY	OHIO VALLEY		147- 32322-			BACK END AMMONI	A NATURAL	MMBTU/	THE FLARE AND ARE LIMITED TO 336		NATURAL GAS PILOT, FLARE	LB/MMB1						SSM EVENTS LIMITED TO 336 HRS
LAER 0.068 lb/MMBtu		RESOURCES, LLC	SPENCER	IN 00062	2873 415	42 42494 NITROGENOUS FERTILIZER PRODUCTION PLANT	FLARE	19.31 GAS		HR/YR. HEAT INPUT IS FOR	Nitrogen Oxides (NOx)	10102 MINIMIZATION PRACTICES	0.068 U	3-HR AVERAGE BACT-PSD	624.94 LB/H, SSM EVENTS	3-HR AVERAGE	0		PER YEAR
										PILOT ONLY. SSM EVENTS HAVE									
				147-						SEPARATE LIMITS. SSM VENTING IS									
LAER 0.068 lb/MMBtu	OHIO VALLEY IN-0179 RESOURCES, LLC	OHIO VALLEY RESOURCES, LLC	SPENCER	32322- IN 00062	2873 415	42 42494 NITROGENOUS FERTILIZER PRODUCTION PLANT	AMMONIA STORAGE	NATURAL 19.31 GAS	MMBTU/	LIMITED TO 168 HOURS PER YEAR.	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	LB/MMB1 0.068 U	3-HR AVERAGE BACT-PSD	LB/H, SSM 125 VENTING	3-HR AVERAGE	0		SSM VENTING IS LIMITED TO 168 HR PER YEAR.
D LET 0.000 IS/MINISTA	in 0273 incoonecs, etc	NESOUNCES, EEC	SI ENCEN	55552	2075 413	42-34 MINOSENSOS TENNELERI NOSCENSIVI SINI	T D WC	13.31 0.0	0.15 //	HEAT INPUT IS FOR NATUAL GAS PILOT.	THE OBEN ON DES (NOX)	1010E WHITE HOW TWO TIES	0.000	3 HVVELVIGE BACT 135	113 VENTINO	J III VICE IVIOE			THE TENTE
										SSM EMISSIONS HAVE SEPARATE									
				147-						LIMITS. SSM VENTING LIMITED									
LAER 0.068 lb/MMBtu	OHIO VALLEY IN-0179 RESOURCES, LLC	OHIO VALLEY RESOURCES, LLC	SPENCER	32322- IN 00062	2873 415	42 42494 NITROGENOUS FERTILIZER PRODUCTION PLANT	UAN PLANT VENT FLARE	19.31	MMBTU/	TO 336 HOURS PER	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	LB/MMB1 0.068 U	3-HR AVERAGE BACT-PSD	LB/H, SSM 332.08 VENTING	3-HR AVERAGE	0		SSM VENTING LIMITED TO 336 HR PER YEAR.
D LET 0.000 IS/MINISTA	in 0273 incoonecs, etc	NESOUNCES, EEC	SI ENCEN	55552	2075 413	42-34 MINOSENSOS TENNELERI NOSCENSIVI SINI	T D W.C	13.31	0.15	SSM VENTING IS LIMITED TO 336	THE OBET ON DES (NOX)	10102 WHITE THOU THE COLUMN	0.000	3 HVVELVIGE BACT 135	332.00 VENTING	J INVACIONOL			TEN TEN III
				139-						HOURS PER YEAR. HEAT INPUT OF 4									
LAER 0.068 lb/MMBtu	MIDWEST FERTILIZE IN-0180 CORPORATION	R MIDWEST FERTILIZER	DOSEA	33576- IN 00059	2873 417	94 42495 A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACIL	LITY EPONT END ELAPE	NATURAL 19.31 GAS	ммвти/	MMBTU/HR IS FOR PILOT ONLY.	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	LB/MMB1	. 3-HR AVERAGE BACT-PSD	LB/H, SSM 595.49 VENTING	3-HR AVERAGE			
LAER U.UGO ID/IVIIVIDEU	IN-0180 CORPORATION	CORPORATION	POSET	00039	28/3 41/	42493 A STATIONARY NITROGEN PERTILIZER WANGPACTORING PACIE	EITT PROINT END PLAKE	19.51 GAS	* "	SSM VENTING SHALL	Nitiogen Oxides (NOX)	10102 WINNIWIZATION PRACTICES	0.068 0	3-TIN AVENAGE BACT-F3D	393.49 VENTING	5-FIR AVERAGE	0		
				139-						NOT EXCEEDD 336 HOURS PER YEAR.									
LAER 0.068 lb/MMBtu	MIDWEST FERTILIZE IN-0180 CORPORATION	R MIDWEST FERTILIZER	POSEY	33576- IN 00059	2972 417	94 42495 A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACIL	LITY BACK END ELABE	NATURAL 19.31 GAS	ммвти/	HEAT INPUT IS PILOT	Nitrogen Oxides (NOx)	NATURAL GAS PILOT, FLARE 10102 MINIMIZATION PRACTICES	LB/MMB1	. 3-HR AVERAGE BACT-PSD	LB/H, SSM 624.94 VENTING	3-HR AVERAGE			
D LET 0.000 IS/MITISTA	III 0200 COM COMMON	COM CIRTION	1 0321	00033	2075 427	4243 NSTATIONAL THROUGH TELEVISION OF THE PARTY OF THE PA	DIEN END ID III.	13:31 0:0		HEAT INPUT IS FOR PILOT ONLY. SSM	THE OBET ON DES (NOX)	10102 WHATHER THOU THE COLUMN	0.000	3 HVVELVICE BACT 135	024.54 VEHINO	J INTACTORIO			
										EMISSIONS HAVE SEPARATE LIMITS.									
	MIDWEST FERTILIZE	R MIDWEST FERTILIZER		129- 33576-			AMMONIA STORAGE	NATURAL	MMRTII/	SSM VENTING LIMITED 168		NATURAL GAS PILOT, FLARE	LB/MMB		LB/H, SSM				
LAER 0.068 lb/MMBtu	IN-0180 CORPORATION	CORPORATION	POSEY	IN 00059	2873 417	94 42495 A STATIONARY NITROGEN FERTILIZER MANUFACTURING FACIL		19.31 GAS	1.5 H	HOURS.	Nitrogen Oxides (NOx)		0.068 U	3-HR AVERAGE BACT-PSD	125 VENTING	3-HR AVERAGE	0		
	LAKE CHARLES CHEMICAL COMPLEX	x -SASOL NORTH		PSD-I A-		Chemical Production Unit for Linear Alkyl Benzene	EQT0026 - LAB Unit	Natural											
	LA-0244 LAB UNIT	AMERICA, INC.	CALCASIEU	LA 291(M3)	2869 405	11 40730 (LAB)production.	Flare LF-1	19.31 Gas	0		Nitrogen Oxides (NOx)	10102 Steam Assisted	10.23 LB/H	HOURLY MAXIMUM BACT-PSD	U 0		0		BACT was determined in 1983
	NORCO HYDROGEN LA-0264 PLANT	AIR PRODUCTS AND CHEMICALS, INC.	ST. CHARLES	PSD-LA- LA 750(M1)	2813 411	A new hydrogen plant (SMR) which was previously propoposed 56 41523 Valero (LA-0245)	d by Flare (EQT0003)	natural 19.31 gas	MMBTU/ 0.31 H		Nitrogen Oxides (NOx)	Proper Equipment designs and good 10102 combustion practices	0.03 LB/H	0.096774 HOURLY MAXIMUM BACT-PSD	U 0.09 T/YR	ANNUAL MAXIMUM	0		
												COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP							
												VELOCITY PROVISIONS OF 40 CFR 63 SUBPART A OR ADHERE TO THE							
application on LADQ has emissions during SU of 30.99 lb/hr max, 25.83 lb/hr avg, 4.34 tpy										NATURAL GAS (PILOT): 0.25 MM		REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL							
with 14.94 MMBtu/hr 2.07lb/MMBtu and 0.02 lb/hr max, 0.25 MMBtu/hr 0.08	AMMONIA PRODUCTION	DYNO NOBEL LOUISIANA		PSD-LA-			AMMONIA STORAGE			BTU/HR VENT GAS: 14.94		TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT							STARTUP NOX LIMITS ATTRIBUTED TO THIS FLARE (2202-B SU, EQT
lb/MMBtu	LA-0272 FACILITY	AMMONIA, LLC	JEFFERSON	LA 768	2873 413	60 42494 2780 TON PER DAY AMMONIA PRODUCTION FACILITY	FLARE (2202-B)	19.31	15.19	MM BTU/HR	Nitrogen Oxides (NOx)	10102 AT ALL TIMES.  COMPLY WITH THE MINIMUM HEAT	0.04 LB/H	0.002633 HOURLY MAXIMUM BACT-PSD	U 0.13 T/YR	ANNUAL MAXIMUM	0		0014): 30.99 LB/HR & 9.75 TPY.
												CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS OF 40 CFR 63							
										NATURAL GAS		SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR							
	AMMONIA	DYNO NOBEL								(PILOT): 1.829 MM BTU/HR		63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED							
LAEQ application 0.15 lb/hr max, 1.829 MMBtu/hr 0.082lb/MMBtu	PRODUCTION LA-0272 FACILITY	LOUISIANA AMMONIA, LLC	JEFFERSON	PSD-LA- LA 768	2873 413	60 42494 2780 TON PER DAY AMMONIA PRODUCTION FACILITY	FRONT END PROCES FLARE (2203-B)		8982.843	VENT GAS: 6782.433 MM BTU/HR	Nitrogen Oxides (NOx)	TO IT; OPERATE WITH FLAME PRESENT 10102 AT ALL TIMES.	0.15 LB/H	1.67E-05 HOURLY MAXIMUM BACT-PSD	U 0.54 T/YR	ANNUAL MAXIMUM	0		Mass limits in PSD permit exclude emissions associated with startup.
												COMPLY WITH THE MINIMUM HEAT CONTENT AND MAXIMUM TIP							
												VELOCITY PROVISIONS OF 40 CFR 63 SUBPART A OR ADHERE TO THE							
										NATURAL GAS (PILOT): 1.829 MM		REQUIREMENTS OF 40 CFR 63.11(B)(6)(i); OPERATE FLARE AT ALL							
LAEQ application 0.15 lb/hr max, 1.829	AMMONIA PRODUCTION	DYNO NOBEL LOUISIANA		PSD-LA-			BACK END PROCESS			BTU/HR VENT GAS: 8981.014		TIMES EMISSIONS ARE BEING VENTED TO IT; OPERATE WITH FLAME PRESENT							Mass limits in PSD permit exclude
MMBtu/hr 0.082lb/MMBtu	LA-0272 FACILITY	AMMONIA, LLC	JEFFERSON	LA 768	2873 413	60 42494 2780 TON PER DAY AMMONIA PRODUCTION FACILITY	FLARE (2204-B)		8982.843		Nitrogen Oxides (NOx)	10102 AT ALL TIMES.  COMPLY WITH THE MINIMUM HEAT	0.15 LB/H	1.67E-05 HOURLY MAXIMUM BACT-PSD	U 0.54 T/YR	ANNUAL MAXIMUM	0		emissions associated with startup.
												CONTENT AND MAXIMUM TIP VELOCITY PROVISIONS OF 40 CFR 63							
												SUBPART A OR ADHERE TO THE REQUIREMENTS OF 40 CFR							
	AMMONIA	DYNO NOBEL										63.11(B)(6)(i); OPERATE FLARE AT ALL TIMES EMISSIONS ARE BEING VENTED							
	PRODUCTION LA-0272 FACILITY	LOUISIANA AMMONIA, LLC	JEFFERSON	PSD-LA- LA 768	2873 413	60 42494 2780 TON PER DAY AMMONIA PRODUCTION FACILITY	RAIL LOADING FLARI (2205-B)	19.31	0.25	0.25 MM BTU/HR	Nitrogen Oxides (NOx)	TO IT; OPERATE WITH FLAME PRESENT		0.12 HOURLY MAXIMUM BACT-PSD	U 0.08 T/YR	ANNUAL MAXIMUM	0		
						LAB production unit, PSD-LA-291(M2) issued October 18, 1998 PSD-LA-291(M3) issued November 29, 2010.													
	LINEAR ALKYL LA-0275 BENZENE (LAB) UNIT	SASOL CHEMICALS T (USA) LLC	CALCASIEU	PSD-LA- LA 291(M4)	2865 424	Permit PSD-LA-291(M4) for emission limits revision, No BACT	LF-1 - LAB Unit Flare	Natural 19.31 Gas	0		Nitrogen Oxides (NOx)	10102 Steam assisted	10.15 LBS/HR	HOURLY MAXIMUM BACT-PSD	U 0		0		
		12.5							-									<u> </u>	

					DEDMIT I	DATE_DET					EMISSION	EMISSION LIMIT 1	COMPLIA	EMISSION LIMIT 2		STANDAR STANDAR D_LIMIT_	
Comments	RBLCID FACILITY_NAME	CORPORATE_OR_CO	FACILITY COUNTY	FACILITY_ PERMIT_N	SSUANCE	I EKMINATI  ON_LAST_  UPDATED   FACILITY_DESCRIPTION	PROCESS NAME	PROCCESS PRIMARY_ THROUGH THROUGH _TYPE FUEL PUT PUT_UNIT		CAS_NUM POLLUTANT BER CONTROL METHOD DESCRIPTION	EMISSION _LIMIT_1_ LIMIT 1 UNIT	EMISSION_LIMIT_1_ AVG_TIME_CONDITI ON CASE_BASIS	NCE_VERI EMISSION EMISSION_LIMIT_2	AVGERAGE_TIME_C ONDITION	ION_LIMI		POLLUTANT_COMPLIANCE_NOTES
	LAKE CHARLES						Multi-Point Ground			Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subparts FFF and Ss, including but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 44 CFR 63.245(f), and the flame monitoring requirements of 40 CFR 63.987 and 45 CFR 63.987 in minimization of flaring through adherence to the Lake Charle Chemical ComplexéC™s startup, shutdown, and maifunction plan (SSMP) developed in accordance with 40 CFR 63.64(s)3; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the site of the steam should be flares, the flow of steam to the site of the steam should be sited to the flares, the flow of steam to the sited flares, the flow of steam to the sited	0						
N/A Ground flare	CHEMICAL COMPLEX LA-0291 GTL UNIT	(USA) LLC	CALCASIEU	PSD-LA- LA 778 28	69 41782	2 42632	Flares (EQT 836 & 837)	19.31 0		tips; and the use of natural gas as pilo Nitrogen Oxides (NOx) 10102 gas.	1072.86 LB/HR	HOURLY MAXIMUM BACT-PSD	U 44.86 TPY	ANNUAL MAXIMUM	0		
	LA-0295 WESTLAKE FACILITY	EQUISTAR CHEMICALS, LP	CALCASIEU	PSD-LA- LA 806 28:	21 42563	3 42632 Polypropylene manufacturing facility	Cogeneration Plant Flare (449, EQT 326)	19.31 0	Flare is subject to 40 CFR 60.18 and Subpart DDD.	Nitrogen Oxides (NOx) 10102	12.6 LB/H	HOURLY MAXIMUM BACT-PSD	U		0		Annual NOx emissions from the Cogeneration Plant Flare (449, EQT 326); the M-Line Production Area Flare (22, EQT 19); and the Plant 5 Flare (22, EQT 138) (not addressed in the PSD permit) are limited to 36.65 TPY (6RP 12).
	LAKE CHARLES CHEMICAL COMPLEX LA-0296 LDPE UNIT	SASOL CHEMICALS (USA) LLC	CALCASIEU	PSD-LA- LA 779 28	21 41782	The Low Density Polyethylene (LDPE) Unit will produce LDPE by 4.2853 the high pressure polymerization of ethylene.	LLPDE/LDPE Multi- Point Ground Flare (EQT 640)	1931 0	The flare controls the following process vents: Purgas C-1 (LIDF-C-1, EQT 0641) Compressor Area C-2 (LIDF-C-2, EQT 0642) Comonomer Degassing Column C 3 (LIDF-C-3, EQT 0643) Isopentane Degassing Column C 4 (LIDF-C-4, EQT 0644) Purification Bed Regeneration C-7 (LIDF-C-7, EQT 0645) Analyzer Vents C-8 (LIDF-C-9, EQT 0646) Vent Recovery Accumulator C-9 (LIDF-C-9, EQT 06467)	Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart 55, minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow and for steam-assisted flares, the flow of steam to the flare tip; and the use of natural gas as pilot Nitrogen Oxides (NOX) 10102 gas.	3	HOURLY MAXIMUM BACT-PSD	U 39.25 TPY	ANNUAL MAXIMUM	0		BACT is compiliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987.  BACT is also determined to be minimization of flaring through adherence to the Lake Charles Chemical ComplexáEms startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); continuously monitoring the volume of vent gas routed to the flare, the lower heating value or composition of the vent gas, the full gas flow rate, and for steam- assisted flares, the flow of steam to flare its and the use of natural gas as pilot gas.
	LAKE CHARLES CHEMICAL COMPLEX LA-0299 ETHOXYLATION UNIT		CALCASIEU	PSD-LA- LA 779 28	69 41782	2 42853	ETO/Guerbet Elevated Flare (EQT 1079)	19.31 0		Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63.11(b) and 1010 provisions of 40 CFR 63.11(b) and 1010 provisions of 40 CFR 63.11(b) part PPP		HOURLY MAXIMUM BACT-PSD	U 3.26 TPY	ANNUAL MAXIMUM	0		The permittee shall continuously monitor and record the volume of vent gas routed to the following flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips.
	LAKE CHARLES CHEMICAL COMPLEX LA-0301 ETHYLENE 2 UNIT	SASOL CHEMICALS (USA) LLC	CALCASIEU	PSD-LA- LA 779 280	69 41782	2 42853	Elevated Flare (EQT 981)	19.31 0		Compliance with 40 CFR 63.11(b) and 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through aherence to Sasolá <sup>CM</sup> 's SSMP, monitoring the volume of vert gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilo Nitrogen Oxides (NOx) 10102 gas	f	HOURLY MAXIMUM BACT-PSD	U 22.62 TPY	ANNUAL MAXIMUM	0		BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987. In addition, BACT is minimization of flaring through adherence to the Lake Charles Chemical Complex4C**—S startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.

						PERMIT_I E	DATE_DET ERMINATI							EMISSION	EMISSION_LIMIT_1_	COMPLIA		STANDAR STANDAR D_LII AD_EMISS D_EMISSI AVER	
Comments	RBLCID FACILITY_NAME	CORPORATE_OR_CO MPANY_NAME		FACILITY_ PERMIT_N STATE UM		SSUANCE O		PROCESS_NAME	PROCCESS PRIMARY_ _TYPE FUEL			POLLUTANT I	CAS_NUM BER CONTROL_METHOD_DESCRIPTION	EMISSION _LIMIT_1_	AVG_TIME_CONDITI CASE-BY-	NCE_VERI EMISSION EMISSION_LIMIT_2		ION_LIMI ON_LIMIT _TIM	
																			BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987, and the flame monitoring requirements of 40 CFR 63.987.  In addition, BACT is minimization of flaring through adherence to the
N/A Ground flare	LAKE CHARLES CHEMICAL COMPLEX LA-0301 ETHYLENE 2 UNIT	SASOL CHEMICALS (USA) LLC	CALCASIEU	PSD-LA- LA 779	2869	41782	42853	Ground Flare (EQT 982)	19.31	0		Nitrogen Oxides (NOx)	Compliance with 40 CFR 63.11(b) and 40 CFR 63 Subpart SS; minimization of flaring through adherence to Sasoláe™s SSMP; monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot 10102 gas	8565.31 LB/HR	HOURLY MAXIMUM BACT-PSD	U 50.84 TPY	ANNUAL MAXIMUM	0	take Charles Chemical Complex&E**s startup, shutdown, and malfunction plan (SSAMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steamassisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.
	LAKE CHARLES CHEMICAL COMPLEX LA-0302 EO/MEG UNIT		CALCASIEU	PSD-LA- LA 779	2869	41782	42853	Elevated Flare and Ground Flare (EQTs 1012 & mp; 1013)	19.31		Normal operating rate = 79,370 lb/hr	Nitrogen Oxides (NOx)	Compliance with 40 CFR 63.11(b) and the closed vent system requirements of 40 CFR 63.14(8) minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips, and the use of 10102 natural gas as pilot gas	2.43 LB/HR	HOURLY MAXIMUM BACT-PSD	U 1.06 TPY*	ANNUAL MAXIMUM	0	Pound per hour NOx limitations are per flare.  *Annual NOx emissions from both flares are limited to the TPY value reported.
	LAKE CHARLES CHEMICAL COMPLEX ZIEGLER ALCOHOL LA-0303 UNIT		CALCASIEU	PSD-LA- LA 779	2869	41782	42853	Elevated Flare (EQT 133)	19.31		Normal operating rate = 860.33 MM lb/yr	Nitrogen Oxides (NOx)	Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vert gas routed to the flares, the lower heating value or composition of the vert gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of 1002 natural gas as pilot gas as pilot gas.	55.32 LB/HR	HOURLY MAXIMUM BACT-PSD	U 41.42 TPY	ANNUAL MAXIMUM	0	BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS, including, but not limited to, the closed went system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.2450(f), and the flame monitoring requirements of 40 CFR 63.987 and 50 CFR 63.987.  In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical Complexé'es startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.
N/A Ground flare	LAKE CHARLES CHEMICAL COMPLEX ZIEGLER ALCOHOL LA-9303 UNIT		CALCASIEU	PSD-IA- IA 779	2869	41782	42853	Emission Combustion Unit #3 Ground Flare (EQT 500)			Normal operating rate = 860.33 MM lb/yr	Nitrogen Oxides (NOx)	Compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 Subpart SS; minimization of flaring through adherence to the SSMP developed in accordance with 40 CFR 63.6(e)(3); monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of 1002 natural gas as pilot gas gas pilot gas.	49.68 LB/HR	HOURLY MAXIMUM BACT-PSD	U 10.78 TPY	ANNUAL MAXIMUM	0	BACT is compliance with 40 CFR 63.11(b) and the applicable provisions of 40 CFR 63 subpart SS, including, but not limited to, the closed vent system requirements of 40 CFR 63.983, the flare compliance assessment requirements of 40 CFR 63.987 and 40 CFR 63.987 and 40 CFR 63.987. In addition, BACT is determined to be minimization of flaring through adherence to the Lake Charles Chemical ComplexaE'ms startup, shutdown, and malfunction plan (SSMP) developed in accordance with 40 CFR 65.6(e)[3], monitoring the volume of vent gas routed to the flares, the lower heating value or composition of the vent gas, the fuel gas flow rate, and for steam-assisted flares, the flow of steam to the flare tips; and the use of natural gas as pilot gas.
NA Ground naie	LAKE CHARLES	LAKE CHARLES		PSD-LA-			Proposed facility to produce methanol, H2, H2SO4, CO2, Argon a	and		мм	10/11			43.00 EB/TR		20.70 171	WINDAL WANTYUM		Bos as prior Eas.
LAER 0.068 lb/MMBtu	LA-0305 METHANOL FACILITY  INDORAMA LAKE LA-0314 CHARLES FACILITY	INDORAMA VENTURES OLEFINS, LLC	CALCASIEU PARISH	LA 803(M1)  PSD-LA- LA 813	2869	42551 42585	42853 electricity from Pet Coke  modify and restart-up a mothballed facility to produce 1,009  42853 million ibs/yr of ethylene	Flares Flare No. 1 - 008	19.31 Fuel Gas natural 19.31 gas	1008 BTU/hr  MM 85097 BTU/yr		Nitrogen Oxides (NOx)  Nitrogen Oxides (NOx)	complying with 40 CFR 60.18; good combustion practices (including establishment of flare minimization practices)  complying with 40 CFR 60.18 and	0 LB/MM 0.068 BTU	BACT-PSD  BACT-PSD	U 0		0	
LAER 0.068 lb/MMBtu	INDORAMA LAKE LA-0314 CHARLES FACILITY	INDORAMA VENTURES OLEFINS, LLC	CALCASIEU	PSD-LA- LA 813	2869	42585	modify and restart-up a mothballed facility to produce 1,009 42853 million lbs/yr of ethylene	Pyrolysis Gasoline Tank Flare - 009	natural 19.31 gas	mm 0.66 btu/hr		Nitrogen Oxides (NOx)		LB/MM 0.068 BTU	BACT-PSD	U 0		0	
LAER 0.068 lb/MMBtu	INDORAMA LAKE LA-0314 CHARLES FACILITY	INDORAMA VENTURES OLEFINS, LLC	CALCASIEU	PSD-LA- LA 813	2869	42585	modify and restart-up a mothballed facility to produce 1,009 42853 million lbs/yr of ethylene	vessel evacuation flare - 018	natural 19.31 gas	mm 3.04 btu/hr		Nitrogen Oxides (NOx)	good combustion practices (including establishment of flare minimization 10102 practices)	LB/MM 0.068 BTU	THREE ONE-HOUR TEST AVERAGE BACT-PSD	υ ο		0	
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		CORPORATE_OR_CO		FACILITY_ PERMI	IT N		ERMINATI	p	PROCCESS PRIMARY_TH	IROUGH THROUGH			CAS_NUM	EMISSION _LIMIT_1_	EMISSION_LIMIT_1_ AVG_TIME_CONDITI CASE-BY-	COMPLIA NCE_VERI EMISSION EMISSION_LIMIT_2	EMISSION_LIMIT_2_	AD_EMISS D	_EMISSI AVERAGE	
Comments	RBLCID FACILITY_NAME METHANEX -	MPANY_NAME	FACILITY_COUNTY	STATE UM			UPDATED FACILITY_DESCRIPTION PROCESS_N	_NAME _	TYPE FUEL PU	IT PUT_UNIT	PROCESS_NOTES	POLLUTANT	BER CONTROL_METHOD_DESCRIPTION	_LIMIT_1 UNIT	ON CASE_BASIS	FIED _LIMIT_2 _UNIT	ONDITION			POLLUTANT_COMPLIANCE_NOTES
	GEISMAR METHANO			PSD-LA			methanol plant (Unit I and Unit II) to produce 6000 metric tons of flares (I-X-7	-703, II-X-	natural	mm										BACT = LAER (Permit 0180-00210-
	LA-0317 PLANT MONSANTO LULING			LA 761(M PSD-LA	A-				19.31 gas Natural	3723 btu/hr		Nitrogen Oxides (NOx)		0	BACT-PSD	U 0		0		V4, dated 12/22/2016)
	LA-0323 PLANT	COMPANY	ST. CHARLES PARISH	H LA 890	2879	42744	43231 Chemical Manufacture Emergency	cy Flare	19.31 Gas	0.4 mmbtu/h		Nitrogen Oxides (NOx)	10102 Proper design and operation	0	BACT-PSD	U 0		0		
											pressure, multi- point, staged ground									
											flare.									
											The high pressure (HP) ground flare is									
											used to meet									
											control requirements									
											associated with BACT, NSPS, BAT,									The high pressure (HP) ground flare is used to meet control
											and MACT for									requirements associated with
											affected facility operations and									BACT, NSPS, BAT, and MACT for affected facility operations and
											process vents. For efficient permitting									process vents. For efficient permitting structure, the HP ground
											structure, the HP									flare has been permitted as a
											ground flare has been permitted as a									separate and individual emissions unit to contain limitations,
											separate and individual emissions									operational restrictions, monitoring, record keeping,
											unit to contain									reporting, and testing associated
											limitations, operational									with control requirements.
	PTTGCA PETROCHEMICAL	PTTGCA PETROCHEMICAL					High Pressu	sure Ground	Natural	MMBTU/	restrictions, monitoring, record				PER ROLLING 12 MONTH PERIOD. SEE					The high pressure (HP) flare controls VOC emissions from units
	OH-0378 COMPLEX	COMPLEX	BELMONT	OH P01249	972 2869	43455	43635 Petrochemical Complex Flare (P003		19.31 gas	1.8 H	keeping, reporting,	Nitrogen Oxides (NOx)	10102 use of natural gas as pilot light fuel	0.536 T/YR	NOTES. BACT-PSD	U 0		0		P801, P802, P803, P804, and P805.
											pressure, multi- point, staged ground									
											flare.									
											The low pressure									
											(LP) ground flare is used to meet									
											control requirements									
											associated with									The low pressure (LP) ground flare
											BACT, NSPS, BAT, and MACT for									is used to meet control requirements associated with
											affected facility operations and									BACT, NSPS, BAT, and MACT for affected facility operations and
											process vents. For									process vents. For efficient
											efficient permitting structure, the ECU									permitting structure, the ECU ground flare has been permitted as
											ground flare has been permitted as a									a separate and individual emissions unit to contain limitations,
											separate and									operational restrictions,
											individual emissions unit to contain									monitoring, record keeping, reporting, and testing associated
											limitations, operational									with control requirements.
	PTTGCA PETROCHEMICAL	PTTGCA PETROCHEMICAL					Low Pressu	sure Ground	Natural	MANARTII/	restrictions, monitoring, record				PER ROLLING 12 MONTH PERIOD. SEE					The low pressure (LP) flare controls VOC emissions from units P804 and
	OH-0378 COMPLEX	COMPLEX	BELMONT	OH P01249	972 2869	43455	43635 Petrochemical Complex Flare (P004		19.31 gas	0.78 H	keeping, reporting,	Nitrogen Oxides (NOx)	10102 use of natural gas as pilot light fuel	0.232 T/YR	NOTES. BACT-PSD	U 0		0		P805.
											INCREASES FROM THE FLARES ARE									
											DUE TO THE									
											COMBUSTION OF NATURAL GAS USED									
											AS SWEEP GAS IN THE FLARE HEADER									
							C4 OLEFINS COMPLEX				SYSTEM. THE NATURAL GAS ALSO									
							BRIEF PLANT DESCRIPTION/NARRATIVE (FOR EXAMPLE - CHEMICAL				HELPS TO MAINTAIN									
							PLANT, STEEL MILL, PAINT MANUFACTURING, ETC.): C4 OLEFINS COMPLEX				THE MINIMUM HEATING VALUE									
							BRIEF EMISSION SOURCE(S) DESCRIPTION (FOR EXAMPLE - BOILER, PAINT SPRAY BOOTH, FURNACE, ETC.): STORM WATER TANK,				NECESSARY TO ENSURE									
							COOLING TOWER, FUGITIVES, TANK TRUCK LOADING , AND				DESTRUCTION OF									
							ABOILER, TYPE(S) OF FUEL USED AT THIS FACILITY:				THE VOCS IN THE VENT STREAMS. THE									
							DESCRIPTION OF THE POLLUTION ABATEMENT STRATEGY (FOR EXAMPLE - FABRIC FILTER, ESP, CARBON ADSORBERS, POWDER				NATURAL GAS FLOW WAS NOT									
							COATINGS, ETC.): HIGH AND LOW-PRESSURE FLARES, AND AN AMMONIA SCRUBBER				COMPLETELY ACCOUNTED FOR IN									
							FACILITY NOTES: THE FACILITY INCLUDES A BUTADIENE UNIT WITH				THE ORIGINAL									
							A MAXIMUM CAPACITY OF 1 BILLION POUNDS PER YEAR OF BUTADIENE, AN ALKYLATE (MIXTURE OF OCTANES) UNIT				PERMIT REPRESENTATIONS									
	SABINA	SABINA		440.0			(REFERRED TO AS INALK UNIT) WITH A MAXIMUM CAPACITY OF 1	D LOW	MATHRA		AND IS BEING									
	TX-0575 LLC	PETROCHEMICALS LLC	JEFFERSON	41945, TX N018N		40410	BILLION POUNDS PER YEAR OF ALKYLATE, AND ANCILLARY  HIGH AND I  42502 SUPPORT EQUIPMENT.  PRESSURE I		NATURAL 19.31 GAS		ADDED TO THE PERMIT AT THIS	Nitrogen Oxides (NOx)	10102	9.07 T/YR	ANNUAL LAER	Υ 0		0		
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		CORPORATE_OR_CO		FACILITY_ PERMIT_N	PERMIT_I SSUANCE	ERMINATI		PROCCESS PRIMARY_THR	OUGH THROUGH			AS NUM	EMISSION _LIMIT_1		COMPLIA NCE_VERI EMISSION EMISSION_LIMIT_2		AD_EMISS	D_EMISSI AVERAGE	
Comments	RBLCID FACILITY_NAME		FACILITY_COUNTY			UPDATED FACILITY_DESCRIPTION	PROCESS_NAME	_TYPE FUEL PUT	PUT_UNIT	PROCESS_NOTES		ER CONTROL_METHOD_DESCRIPTION	_LIMIT_1 UNIT	ON CASE_BASIS	FIED _LIMIT_2 _UNIT	ONDITION	T	_UNIT NDITION	POLLUTANT_COMPLIANCE_NOTES
										throughput limit A flare is used to									
										combust unreacted hydrogen, destroy									
										impure									
										hydrogen/ammonia streams, and to									
										control process shutdowns. The									
										Flare is claimed to achieve 99% control									
										for ammonia. Best									
										Available Control Technology (BACT)									
										for carbon monoxide (CO) from									
										flares is good									
										combustion practices. Sulfur									
										Dioxide (SO2) emissions are									
										controlled with the use of pipeline									
								Natural		quality natural gas									The TPY emission rate is based on
	PEONY CHEMICAL MANUFACTURING			118239,				gas, ammonia,		as fuel gas. The only volatile organic									all operating scenarios. the lb/hr rate is based on worst case MSS
	TX-0728 FACILITY	BASF	BRAZORIA	TX N200 2813 122353,	42095	42506 Ammonia production with hydrogen imported	ammonia flare	19.31 hydrogen 1	106396 MMBtu/y	r compound (VOC)	Nitrogen Oxides (NOx)	10102 no control	223.41 LB/H	0.11053 LAER	U 5.39 T/YR		0		scenarios.
	PORT ARTHUR	TOTAL		PSDTX142						Applicant will obtain an AMOC and AMEL									Emission rate of 94.27 tpy is the sum of 35.86 tpy NOx for routine
	ETHANE SIDE	PETROCHEMICALS &		GHGPSDT			Multi Point Ground	NATURAL		prior to startup of									operations and 58.41 tpy NOx for
	TX-0815 CRACKER	REFINING USA, INC.	JEFFERSON	TX X114 2869 PSDTX843	42752	43055 Ethylene Production	Flare	19.31 GAS	0	the MPGF	Nitrogen Oxides (NOx)	10102 Good Combustion Practices & Desig	94.27 T/YR	BACT-PSD	U 0		0		MSS operations.
				M2, PSDTX860		Increase in supplemental natural gas to two flares in a cap, 3 other	r												
	*TX-0838 CHEMICAL PLANT	EXXONMOBIL OIL CORPORATION	IFFFFRSON	M2, TX GHGPSD 2869	43264	flares, with attendant increase in fugitive and MSS emissions from 43773 associated piping.	High and Low Pressure Flare can	19.31	0		Nitrogen Oxides (NOx)	Meet the design and operating 10102 requirements of 40 CFR §60.18.		BACT-PSD			0		
	TA-0030 CHEWICAL PLAINT	CORPORATION	JEFFERSON	PSDTX843	43204	43773 associated piping.	riessule riale cap	19.51	0		Nitrogen Oxides (NOX)	10102 requirements of 40 CFR Ayou.18.		BACT-F3D	0				
				M2, PSDTX860		Increase in supplemental natural gas to two flares in a cap, 3 other													
	*TX-0838 CHEMICAL PLANT	EXXONMOBIL OIL CORPORATION	JEFFERSON	M2, TX GHGPSD 2869	43264	flares, with attendant increase in fugitive and MSS emissions from 43773 associated piping.	UDEX FLARE	19.31	0		Nitrogen Oxides (NOx)	Meet the design and operating 10102 requirements of 40 CFR §60.18.	o	BACT-PSD	U 0		0		
				PSDTX843 M2															
				PSDTX860		Increase in supplemental natural gas to two flares in a cap, 3 other													
	*TX-0838 CHEMICAL PLANT	EXXONMOBIL OIL CORPORATION	JEFFERSON	TX GHGPSD 2869	43264	flares, with attendant increase in fugitive and MSS emissions from 43773 associated piping.	PARAXYLENE FLARE	19.31	0		Nitrogen Oxides (NOx)	Meet the design and operating 10102 requirements of 40 CFR §60.18.	o	BACT-PSD	U 0		0		
				PSDTX843 M2.															
				PSDTX860		Increase in supplemental natural gas to two flares in a cap, 3 other													
	*TX-0838 CHEMICAL PLANT	EXXONMOBIL OIL CORPORATION	JEFFERSON	TX GHGPSD 2869	43264	flares, with attendant increase in fugitive and MSS emissions from 43773 associated piping.	C & S FLARE	19.31	0		Nitrogen Oxides (NOx)	Meet the design and operating 10102 requirements of 40 CFR §60.18.	0	BACT-PSD	U 0		0		
	POLYETHYLENE 7	THE DOW CHEMICAL		153106		Addition of new polyethylene manufacturing plant at the Dow													
	*TX-0863 FACILITY	COMPANY	BRAZORIA	TX AND N268 2869	43711	43749 Freeport Site.	FLARE	19.31	0		Nitrogen Oxides (NOx)	10102 GOOD COMBUSTION PRACTICES	0	BACT-PSD	U 0		0		
						new propane dehydrogenation (PDH) unit and a new													
						polypropylene (PP) production unit: (1)The action concerns the authorization for the PDH unit is													
						under TCEQ Project No. 286455 with assigned Permit Nos. 152181, PSDTX1540, GHGPSDTX182, and N264.	,												
						(2)The action concerns the authorization for the PP unit is under TCEQ Project No. 286467 with assigned Permit Nos. 152184,													
						PSDTX1542, GHGPSDTX183and N266.													
						evaluated as a single project for purposes of evaluating major NSR.	L												
						The project is subject to Nonattainment New Source Review (NNSR) requirements for significant increases of VOC (an ozone													
	EQUISTAR			N266, PSDTX154		precursor) and is subject to Prevention of Significant Deterioration (PSD) requirements for CO and particulate (PM, PM10 and PM2.5).													
	CHEMICALS			2,		Affected units with no modifications include the wastewater													
	*TX-0864 COMPLEX	EQUISTAR CHEMICALS, LP	HARRIS	GHGPSDT TX X183 2869	43717		Multi Point Ground Flare	natural 19.31 gas	0		Nitrogen Oxides (NOx)	good combustion practices, design, 10102 natural gas fuel	o	BACT-PSD	U 0		0		
						new propane dehydrogenation (PDH) unit and a new													
						polypropylene (PP) production unit: (1)The action concerns the authorization for the PDH unit is													
						under TCEQ Project No. 286455 with assigned Permit Nos. 152181	.,												
						PSDTX1540, GHGPSDTX182, and N264.  (2)The action concerns the authorization for the PP unit is under													
						TCEQ Project No. 286467 with assigned Permit Nos. 152184, PSDTX1542, GHGPSDTX183and N266.													
						·	1												
						evaluated as a single project for purposes of evaluating major NSR. The project is subject to Nonattainment New Source Review	-												
				N266,		(NNSR) requirements for significant increases of VOC (an ozone precursor) and is subject to Prevention of Significant Deterioration													
	EQUISTAR CHEMICALS			PSDTX154		(PSD) requirements for CO and particulate (PM, PM10 and PM2.5).  Affected units with no modifications include the wastewater													
	CHANNELVIEW	EQUISTAR	HARRIS	GHGPSDT		treatment system (WWTS) and C3 Splitter project of the Olefin	Florested F	natural			Niles and Oak Control	good combustion practices, design,							
	*TX-0864 COMPLEX	CHEMICALS, LP	HARRIS	TX X183 2869 N264,	43717	43741 plants	Elevated Flare	19.31 gas	U		NITrogen Oxides (NOx)	10102 natural gas fuel	0	BACT-PSD	0		0		
	EQUISTAR CHEMICALS			PSDTX154 0,		new PDH unit. Includea four heaters, one ground flare, one steam- assisted elevated flare, one cooling tower, one CCR vent scrubber,													
	*TX-0865 COMPLEX	EQUISTAR CHEMICALS, LP	HARRIS	GHGPSDT TX X182 2869	43717	one ammonia vent scrubber, catalyst handling systems, several	MULTIPOINT	NATURAL 19.31 GAS	0		Nitrogen Oxides (NOv)	Good combustion practices, proper 10102 design and operation	0	BACT-PSD	U 0		0		
				N264,	-3/1/				-		a Onides (HOA)	and operation		BACT-F3D			3		
	EQUISTAR CHEMICALS			PSDTX154 0,		new PDH unit. Includea four heaters, one ground flare, one steam- assisted elevated flare, one cooling tower, one CCR vent scrubber,													
	*TX-0865 COMPLEX	EQUISTAR CHEMICALS, LP	HARRIS	GHGPSDT TX X182 2869	43717	one ammonia vent scrubber, catalyst handling systems, several 43741 tanks/drums, wastewater, fugitive components and MSS activities.	MEROX ELEVATED . FLARE	NATURAL 19.31 GAS	0		Nitrogen Oxides (NOx)	Good combustion practices, proper 10102 design and operation	0	BACT-PSD	U 0		0		
	-													<del></del>					