

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 30, 2009

LaDonna Castanuela
Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Re: TCEQ DOCKET NUMBER 2006-0031-AIR

Dear Ms. Castanuela:

Enclosed you will find the original and seven copies of the Executive Director's Response to Hearing Requests in the matter of Invista S.a.r.l., Permit No. 20011.

Attached to the Executive Director's Response to Hearing Requests you will find the original and seven copies of the backup filing for this matter.

The attachments include the following documents:

Attachment A – The Compliance History
Attachment B – The Technical Review Summary
Attachment C – The Draft Permit

If you have any questions about this matter, please call me at 239-1976.

Sincerely,

A handwritten signature in black ink that reads "Tim Eubank".

Tim Eubank
Staff Attorney
Environmental Law Division
TCEQ Office of Legal Services

Attachments

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2009 JAN 30 PM 1:38
CHIEF CLERKS OFFICE

TCEQ AIR QUALITY PERMIT NO. 20011

2009 JAN 30 PM 1:38

APPLICATION BY § BEFORE THE
INVISTA S.A.R.L. § TEXAS COMMISSION ON
VICTORIA, VICTORIA COUNTY § ENVIRONMENTAL QUALITY

CHIEF CLERKS OFFICE

EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS

I. Application Request and Background Information

The Executive Director (ED) of the Texas Commission on Environmental Quality (TCEQ) files this response to the requests for a contested case hearing submitted by the persons listed herein. The Texas Health and Safety Code (THSC) § 382.056(n) requires the commission to consider hearing requests in accordance with the procedures provided in Texas Water Code (TWC) § 5.556. This statute is implemented through the rules found in 30 Texas Administrative Code (TAC) Chapter 55, Subchapter F. A current compliance history report, the technical review summary, and the draft permit have been included with this response and have been provided to all persons on the attached mailing list.

On March 15, 2005, Invista S.a.r.l. (Invista) filed an application to renew Air Quality Permit Number 20011 to authorize continued operations of the C-12 Intermediates Unit located at 2695 Old Bloomington Road North, Victoria, Victoria County, Texas. The application was declared administratively complete on April 15, 2005. Invista published Notice of Receipt of Application and Intent to Obtain Air Permit Renewal (NORI) on May 24, 2005 in the *Victoria Advocate* and the Alternative Language Notice was published on June 2, 2005 in the *Revista de Victoria*. The TCEQ received timely hearing requests from Sharon Harper & Steve Stevenson after the publication of NORI. An amendment application was received May 1, 2006 and was declared administratively complete on May 25, 2006. Invista published Notice of Receipt of Application and Intent to Obtain Air Quality Permit Amendment on June 9, 2006 in the *Victoria Advocate* and the Alternative Language Notice was published on June 8, 2006 in the *Revista de Victoria*. No hearing requests were received in response to the amendment application.

During the period between receipt of the amendment application and issuance of the amendment, the Applicant engaged ED's Staff in extended discussions regarding public notice and appropriate disposition of both the renewal and amendment applications. The amendment was issued on May 21, 2008. Invista re-noticed the renewal application on July 22, 2008 in the *Victoria Advocate*. The re-notice of the renewal included notice of the intervening amendment. No hearing requests were received in response to the re-noticed renewal application. The Applicant is not delinquent on any administrative penalty payments to the TCEQ.

Emissions of contaminants authorized under this permit include organic compounds, nitrogen oxides, sulfur dioxide, carbon monoxide, ammonia, nitric acid, boric acid, and particulate matter (including particulate matter less than 10 microns in diameter).

II. Analysis

This renewal would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted. The THSC § 382.056(g) states "The commission may not seek further comment or hold a public hearing...in response to a request for a public hearing on an amendment, modification, or renewal that would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted."¹ Invista is seeking a renewal that would not result in an increase in allowable emissions and will not result in an emission of an air contaminant not previously emitted.

However, the THSC § 382.056(o) states that "notwithstanding other provisions of this chapter, the commission may hold a hearing on a permit amendment, modification, or renewal if the commission determines that the application involves a facility for which the applicant's compliance history is in the lowest classification under Tex. Water Code

¹ See also rule 30 TAC § 55.201(i)(3)(C) (Renewals of air applications that "would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted" are applications for which there is no right to a contested case hearing).

§§ 5.753 and 5.754, and rules adopted and procedures developed under those sections.² The commission adopted 30 TAC Chapter 60 to evaluate compliance history. The lowest classification under the Tex. Water Code §§ 5.753 and 5.754 and 30 TAC § 60.2 is a “poor performer.” Under 30 TAC § 60.3(a)(3)(B), the TCEQ may hold a hearing on an air permit renewal if the site is classified as a poor performer. The compliance history for the company and the site is reviewed for the five-year period prior to the date the permit application was received by the Executive Director. The company and this site have been classified as “AVERAGE” and “AVERAGE,” respectively, and not “POOR” performers according to 30 TAC § 60. At the time of this filing, the compliance history has not changed for the company or the site. Therefore, a hearing should not be granted under § 382.056(o) based on the compliance history of the applicant.

III. Conclusion

The renewal of this permit would not result in an increase in allowable emissions and would not result in the emission of an air contaminant not previously emitted. Under these circumstances, THSC § 382.056(g) directs the commission to “not seek further comment or hold a public hearing.” Because consideration of hearing requests on a “no increase” renewal application is governed by THSC § 382.056(g) and (o), this response does not include an analysis of the individual hearing requests. Accordingly, the Executive Director respectfully recommends that the commission deny the hearing requests as a matter of law and approve the renewal of Invista's permit no. 20011.

Respectfully submitted,

Texas Commission on
Environmental Quality

² See also 30 TAC § 55.201(i)(3)(C) (stating the commission may hold a hearing if the application “involves a facility for which the applicant's compliance history contains violations which are unresolved and which constitute a recurring pattern of egregious conduct which demonstrates a consistent disregard for the regulatory process, including the failure to make a timely and substantial attempt to correct the violations”).

Mark R. Vickery, P.G.
Executive Director

Stephanie Bergeron Perdue,
Deputy Director
Office of Legal Services

Robert Martinez, Director
Environmental Law Division



Tim Eubank, Staff Attorney
Environmental Law Division
State Bar No. 24048458
P.O. Box 13087, MC 173
Austin, Texas 78711-3087

CERTIFICATE OF SERVICE

On January 30, 2009, a true and correct copy of the foregoing instrument was served on all persons on the attached mailing list by the undersigned via deposit into the U.S. Mail, inter-agency mail, facsimile, or hand delivery.



Timothy Eubank

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2009 JAN 30 PM 1:38
CHIEF CLERKS OFFICE

MAILING LIST
INVISTA S.A.R.L.
DOCKET NO. 2006-0031-AIR; PERMIT NO. 20011

For the Applicant:

Bruce E. Chinn, Plant Manager
Invista S.a.r.l.
P.O. Box 2626
Victoria, Texas 77902-2626

Amy E. Hodges
Invista S.a.r.l.
P.O. Box 2626
Victoria, Texas 77902-2626

For the Executive Director:

Tim Eubank, Staff Attorney
Texas Comm. on Environmental Quality
Environmental Law Division, MC 173
P.O. Box 13087
Austin, Texas 78711-3087

Lon Morris, Technical Staff
Texas Comm. on Environmental Quality
Air Permits Division, MC 163
P.O. Box 13087
Austin, Texas 78711-3087

For Public Interest Council:

Mr. Blas J. Coy, Jr., Attorney
Texas Comm. on Environmental Quality
Public Interest Council, MC 103
P.O. Box 13087
Austin, Texas 78711-3087

For Office of Public Assistance:

Ms. Bridget Bohac, Director
Texas Comm. on Environmental Quality
Office of Public Assistance, MC 108
P.O. Box 13087
Austin, Texas 78711-3087

For Alternative Dispute Resolution:

Mr. Kyle Lucas
Texas Comm. on Environmental Quality
Alternative Dispute Resolution, MC 222
P.O. Box 13087
Austin, Texas 78711-3087

For the Chief Clerk:

Ms. LaDonna Castañuela
Texas Comm. on Environmental Quality
Office of Chief Clerk, MC 105
P.O. Box 13087
Austin, Texas 78711-3087

Requesters:

Sharon Harper
1130 FM 1432
Victoria, Texas 77905

Steve Stevenson
1240 FM 1432
Victoria, Texas 77905

Attachment A
Compliance History Report

Compliance History Report

Customer/Respondent/Owner-Operator:	CN602582231	Invista S.a.r.l.	Classification: AVERAGE	Rating: 3.62
Regulated Entity:	RN102663671	INVISTA SARL	Classification: AVERAGE	Site Rating: 0.98
ID Number(s):	AIR OPERATING PERMITS	ACCOUNT NUMBER	VC0008Q	
	AIR OPERATING PERMITS	PERMIT	1415	
	AIR OPERATING PERMITS	PERMIT	1865	
	AIR OPERATING PERMITS	PERMIT	1866	
	AIR OPERATING PERMITS	PERMIT	1867	
	AIR OPERATING PERMITS	PERMIT	1890	
	AIR OPERATING PERMITS	PERMIT	1904	
	AIR OPERATING PERMITS	PERMIT	1902	
	AIR OPERATING PERMITS	PERMIT	1415	
	AIR OPERATING PERMITS	PERMIT	1865	
	AIR OPERATING PERMITS	PERMIT	1866	
	AIR OPERATING PERMITS	PERMIT	1867	
	AIR OPERATING PERMITS	PERMIT	1890	
	AIR OPERATING PERMITS	PERMIT	1902	
	AIR OPERATING PERMITS	PERMIT	1904	
	AIR OPERATING PERMITS	ACCOUNT NUMBER	VC0008Q	
	PETROLEUM STORAGE TANK	REGISTRATION	24717	
	REGISTRATION			
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW004	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW028	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW029	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW030	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW105	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW106	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW142	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW143	
	UNDERGROUND INJECTION CONTROL	PERMIT	WDW144	
	INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXD008123317	
	GENERATION			
	INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXR000057968	
	GENERATION			
	INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50056	
	STORAGE			
	INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50393	
	STORAGE			
	INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50056	
	STORAGE			
	INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION #	87449	
	PROCESSING	(SWR)		
	AIR NEW SOURCE PERMITS	PERMIT	809	
	AIR NEW SOURCE PERMITS	PERMIT	810	
	AIR NEW SOURCE PERMITS	PERMIT	812	
	AIR NEW SOURCE PERMITS	PERMIT	813	
	AIR NEW SOURCE PERMITS	PERMIT	3373	
	AIR NEW SOURCE PERMITS	PERMIT	7186	
	AIR NEW SOURCE PERMITS	PERMIT	7873	
	AIR NEW SOURCE PERMITS	PERMIT	9560	
	AIR NEW SOURCE PERMITS	PERMIT	14751	
	AIR NEW SOURCE PERMITS	PERMIT	20011	
	AIR NEW SOURCE PERMITS	PERMIT	23271	
	AIR NEW SOURCE PERMITS	PERMIT	31376	
	AIR NEW SOURCE PERMITS	PERMIT	34075	
	AIR NEW SOURCE PERMITS	PERMIT	37067	
	AIR NEW SOURCE PERMITS	PERMIT	43301	
	AIR NEW SOURCE PERMITS	PERMIT	43502	
	AIR NEW SOURCE PERMITS	PERMIT	43501	
	AIR NEW SOURCE PERMITS	PERMIT	43614	
	AIR NEW SOURCE PERMITS	PERMIT	44234	
	AIR NEW SOURCE PERMITS	PERMIT	44410	
	AIR NEW SOURCE PERMITS	PERMIT	44463	
	AIR NEW SOURCE PERMITS	PERMIT	45256	

AIR NEW SOURCE PERMITS	PERMIT	45219
AIR NEW SOURCE PERMITS	PERMIT	47610
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	VC0008Q
AIR NEW SOURCE PERMITS	AFS NUM	4846900001
AIR NEW SOURCE PERMITS	REGISTRATION	71504
AIR NEW SOURCE PERMITS	REGISTRATION	71789
AIR NEW SOURCE PERMITS	PERMIT	56688
AIR NEW SOURCE PERMITS	PERMIT	73896
AIR NEW SOURCE PERMITS	REGISTRATION	74109
AIR NEW SOURCE PERMITS	REGISTRATION	74107
AIR NEW SOURCE PERMITS	REGISTRATION	73898
AIR NEW SOURCE PERMITS	REGISTRATION	74566
AIR NEW SOURCE PERMITS	REGISTRATION	76878
AIR NEW SOURCE PERMITS	REGISTRATION	76638
AIR NEW SOURCE PERMITS	REGISTRATION	76575
AIR NEW SOURCE PERMITS	REGISTRATION	76854
AIR NEW SOURCE PERMITS	PERMIT	77089
AIR NEW SOURCE PERMITS	REGISTRATION	80416
AIR NEW SOURCE PERMITS	EPA ID	PSDTX1079
AIR NEW SOURCE PERMITS	REGISTRATION	80416L
AIR NEW SOURCE PERMITS	REGISTRATION	81149
AIR NEW SOURCE PERMITS	REGISTRATION	83151
AIR NEW SOURCE PERMITS	REGISTRATION	86050
AIR NEW SOURCE PERMITS	REGISTRATION	85686
AIR NEW SOURCE PERMITS	REGISTRATION	85648
AIR NEW SOURCE PERMITS	REGISTRATION	85497
AIR NEW SOURCE PERMITS	REGISTRATION	85650
AIR NEW SOURCE PERMITS	REGISTRATION	82508
AIR NEW SOURCE PERMITS	REGISTRATION	82501
AIR NEW SOURCE PERMITS	REGISTRATION	82498
AIR NEW SOURCE PERMITS	EPA ID	P1079
AIR NEW SOURCE PERMITS	REGISTRATION	82497
AIR NEW SOURCE PERMITS	REGISTRATION	85492
AIR NEW SOURCE PERMITS	REGISTRATION	85383
AIR NEW SOURCE PERMITS	REGISTRATION	87075
AIR NEW SOURCE PERMITS	REGISTRATION	85647
AIR NEW SOURCE PERMITS	REGISTRATION	84582
AIR NEW SOURCE PERMITS	REGISTRATION	84639
AIR NEW SOURCE PERMITS	REGISTRATION	83137
AIR NEW SOURCE PERMITS	REGISTRATION	85112
AIR NEW SOURCE PERMITS	REGISTRATION	85493
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	2350014
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	2350014
WASTEWATER	PERMIT	WQ0000476000
WASTEWATER	PERMIT	TPDES0006050
WASTEWATER	PERMIT	TX0006050
WASTEWATER LICENSING	LICENSE	WQ0000476000
WATER LICENSING	LICENSE	2350014
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30079

Location: 2695 OLD BLOOMINGTON RD N, VICTORIA, TX, 77905

TCEQ Region: REGION 14 - CORPUS CHRISTI

Date Compliance History Prepared: January 21, 2009

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: March 14, 2005 to March 15, 2000

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Tim Eubank Phone: 239 - 1000

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? No

3. If Yes, who is the current owner?

N/A

4. If Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

N/A

6. Rating Date: 9/1/2008 Repeat Violator: NO

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgments, and consent decrees of the state of Texas and the federal government.

N/A

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

N/A

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

N/A

F. Environmental audits.

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

Attachment B
Technical Review Summary

Permit Renewal Technical Review Analysis

Company:	Invista Sarl	Permit No.:	20011
City:	Victoria	Project No.:	114216
County:	Victoria	Account No.:	VC-0008-Q
Project Type:	Renewal	Regulated Entity No.:	RN102663671
Project Reviewer:	Mr. Lon Morris	Customer Reference No.:	CN602582231
Facility Name:	C-12 Intermediates Unit		

AUTHORIZATION CHECKLIST SECTION: (If YES to questions in this section, then ED signature required.)

Will a new policy/precedent be established? No
 Is a state or local official opposed to the permit? No
 Is waste or tire derived fuel involved? No
 Are waste management facilities involved? No
 Will action on this application be posted on the Executive Director's agenda? Yes
 Have any changes to the application or subsequent proposals been required to increase protection of public health and the environment during the review? No

PROJECT OVERVIEW SECTION:

Invista S.a.r.l. (INVISTA), submitted a timely application to renew the above referenced permit after being granted a filing extension. This was a no emission increase renewal which received public comments and a hearing request. Typically hearing requests are not granted for no emission increase renewals, however, the applicant subsequently determined that additional changes were required to accurately reflect permitted operations resulting in increased emissions. This resulted in the applicant submitting an amendment/renewal application to replace the previous no emission increase renewal application submitted in March 2005. The applicant included in the amendment/renewal application requests to roll-in several PBR's, remove sources no longer in service, and authorization for various MSS emissions.

Upper management decided to issue the amended permit and require a second public notice for the renewal based on the hearing request for the original renewal application. . A second public notice package, using a revised first public notice package format, was submitted to the applicant. The renewed permit is identical to the amended permit (see project 122509).

REVIEW SUMMARY SECTION:

The amended permit was issued May 21, 2008. A comprehensive review was conducted on the amendment application and the renewed permit reflects the changes incorporated into the amended permit.

COMPLIANCE HISTORY SECTION:

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: April 18, 2008
 The compliance period was from 09/01/2002 to 08/31/2007
 Was the application received after September 1, 2002? Yes
 If yes, what was the site rating & classification? 1.97 Average Company rating & classification? 3.53 Average
 Is the permit recommended to be denied on the basis of compliance history or rating? No
 Has the permit changed on the basis of the compliance history or rating? No

30 TAC CHAPTER 116 RULES:

§116.315(b) Date of expiration of permit July 13, 2005
 §116.310 Date written notice of review was mailed July 22, 2004
 §116.310 Date application for Renewal (PI-1R) rec'd March 15, 2005
 §116.311(a)(1) Do dockside vessel emissions associated with the facility comply with all regulations? N/A
 §116.311(a)(2) Is the facility being operated in accordance with all requirements, conditions, and representations specified in the current permit and do the emissions from the facility comply with all TCEQ air quality rules and regulations, and with the intent of the Texas Clean Air Act? Yes
 §116.311(a)(3) Compliance with applicable NSPS? Yes

Permit Renewal
Technical Review Analysis

Permit No. 20011

Regulated Entity No. RN102663671

Subparts A & Kb
§116.311(a)(4) Compliance with applicable NESHAPS? Yes
Subparts A & FF
§116.311(a)(5) Compliance with applicable NESHAPS for source categories? Yes
Subparts A, EEEE, and FFFF
§116.311(b)(1) Is additional information regarding emissions from the facility and their impacts
on the surrounding area required? No
§116.311(b)(2) Were additional controls/permit conditions necessary to avoid a condition of air pollution or to ensure compliance with
applicable federal or state rules? No
§116.311(c) Compliance History: Is the facility in substantial compliance with the TCAA and the terms of the current permit? .. Yes
§116.314(a) The facility meets all permit renewal requirements? Yes
§116.313(a) Permit Renewal Fee: \$4130.00 Paid? \$3617.00 Check #32459 and \$513.00 Check #34450

PUBLIC NOTICE INFORMATION SECTION:

§39.403 Public notification required? Yes
Date application received: March 15, 2005 Date Administrative Complete: April 15, 2005
Small Business source? No
§39.418 Date 1st Public Notice /Admin Complete/Legislators letters mailed: April 15, 2007
§39.603 Pollutants: Carbon monoxide; nitrogen oxides; ammonia; sulfur dioxide; particulate matter; nitric acid; organic acids;
volatile organic compounds including benzene, 1,3-butadiene, butene, cyclododecane, cyclododecanone,
cyclooctadiene, cyclododecatriene, cyclododecanol, cyclohexane, cyclohexanol, cyclohexanone, urea, and
vinylcyclohexane.
Date Published in Newspaper: May 24, 2005 in Victoria Advocate
Date Affidavits/Copies received: June 13, 2005
Bilingual notice required? Yes Language: Spanish
Date Published in Newspaper: June 2, 2005 in Revista de Victoria
Date Affidavits/Copies received: June 13, 2005
§39.604 Certification of Sign Posting / Application availability June 13, 2005
Public Comments Received? Yes
Notice and Comment Hearing requested? A meeting was requested but denied in a letter dated November 8, 2005 based on a "no-
increase" renewal.
Hearing held? No
Was/were the request(s) withdrawn? No
Replies to Comments sent to OCC: The RTC was filed with OCC in January 2006 and requested to be held until scheduling
with the ED agenda.
§39.419 2nd Public Notification required? Yes
Date 2nd Public Notice mailed: July 10, 2008
§39.603 Pollutants: organic compounds, nitrogen oxides, sulfur dioxide, carbon monoxide, ammonia, nitric acid, boric acid, and particulate
matter (including particulate matter less than 10 microns in diameter).
Date Published in Newspaper: July 22, 2008 in Victoria Advocate
Date Affidavits/Copies received: July 25, 2008
Bilingual notice required? No
Public Comments Received? No
Meeting requested? No
Hearing requested? No
§39.420 Consideration of Comments: N/A

Permit Renewal
Technical Review Analysis

Permit No. 20011

Regulated Entity No. RN102663671

REQUEST FOR COMMENTS SECTION:

Region:	14	Reviewed by:	Sinoel Contreras 02/09/2007
TARA:		Reviewed by:	Jong-Song Lee 02/07/2007
Legal:		Reviewed by:	Tim Eubank 07/10/2008

CHAPTER 113 RULES SECTION:

§113.100 Compliance with applicable MACT standards expected? N/A

PROCESS DESCRIPTION SECTION:

The C-12 Intermediates Unit utilizes a series of four reactions to produce dodecanedioic acid from butadiene. Supporting facilities are provided to purify the intermediate compounds and separate organic wastes for recovery as by-products or for disposal as fuels in the N. 2 APH. The four basic reactions in sequence are:

- Trimerization of butadiene (BD) to cyclododecatriene (CDDT) in the presence of a catalyst in Operations 11 and 11A. BD dimers, cyclooctadiene (COD), and vinylcyclohexane (VCH) are obtained as by-products and used as waste fuel in the Adipic Powerhouse.
- Hydrogenation of the CDDT to cyclododecane (CDD) in Operation 12.
- Air oxidation of the CDD to cyclododecanol and cyclododecanone (A/K) in Operations 13 and 14.
- Nitric acid oxidation of A/K to dodecanedioic acid (DDDA) in operations 15 and 16.

SOURCES AND CONTROLS SECTION:

The review for the amendment application included the following:

Deletions from Special Conditions and MAERT:

Special Conditions No. 6 in the current permit has been removed and replaced with 32M Emission Standard language in Special Condition Nos. 1 and 2 in the amended conditions.

Special Conditions Nos 7, 11, and 12 in the current permit authorizes upset emissions and have been removed from the permit renewal/amendment.

The following sources have been removed from service and are deleted from the MAERT: EPNs 07TFX-33C, 07TFX-052, 18TFX-060, 18TFX-060A, 07LTR-015B, and 07FLT0-46.

Special Condition #10 in the current permit authorizes VOC and PM emissions associated with startup and shutdown activities from four jet vents (EPNs 07VNT-009, -010, 011, and 012). These emissions are routed to the Adipic Powerhouse and are accounted for in permit No. 812 and so are removed from the MAERT in permit 20011 along with special condition #10 from the special conditions.

PBR Roll-ins:

PBR registration #48181 authorizes increased throughput to two oxidation reactors that route vent emissions to Boiler stack 15STK-006 authorized under permit 812. There will be no increased emissions associated with this PBR consolidation.

PBR registration 51518 authorizes increased throughput for Crude DBW Oil storage tanks (EPNs 07TFX-026A and 07TFX-026B) which includes previous existing but not represented oxides of nitrogen emissions. The emissions increases associated with this PBR authorization include less than 0.01 lb/hr and less than 0.01 tpy of NOx and HNO3 for each tank. These tanks are 19,000 gallon capacity storage tanks and satisfy BACT for storage of DBW material.

A DBW H₂ Reactor EPN 07RSY-026F and a DBW Flash Dryer EPN 07DIS-026G are authorized under PBR registration 54319 and will be consolidated into permit #20011. The emissions associated with these EPNs are less than 0.01lbs/hr and 0.01 tpy for ammonia and carbon monoxide. These vessels contain VOC compounds with vapor pressures less than 0.05 psia and BACT does not require a control device for these compounds.

PBR 73767 authorizes the use of sulfuric acid to replace nitric acid to adjust pH of waste water prior to deep well injection.

PBR 73758 authorizes a urea mix tank (EPN 07TFX-636A) and a previously existing urea solution tank (EPN 07TFX-636). 07TFX-636A is a fixed roof 12,900 gallon capacity storage tank while 07TFX-636 is a 1,664 gallon capacity fixed roof tank. The size of these tanks satisfies BACT to store the urea mixtures. AP-42 calculation methodologies determined that emissions from these tanks are 0.02 lbs/hr

Attachment C
Special Conditions and Maximum
Allowable Emission Rates Table

SPECIAL CONDITIONS

Permit Number 20011

EMISSION STANDARDS

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the Special Conditions.
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 one percent are not authorized by this permit unless authorized on the MAERT. 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 releases from those relief devices listed in the attached "List of Exempted C-12 Intermediates Relief Devices" **(05/08)**

FEDERAL APPLICABILITY

3. Tank 18TFL027 shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated for Volatile Organic Liquid Storage Vessels in 40 CFR Part 60, Subparts A and Kb.
4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants promulgated for Benzene Waste Operations in 40 CFR Part 61, Subparts A and FF. **(05/08)**
5. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories promulgated for Organic Liquids Distribution (Non-Gasoline) and Miscellaneous Organic Chemical Manufacturing in 40 CFR Part 63, Subparts A, EEEE and FFFF. **(05/08)**

OPERATIONAL STANDARDS

6. Annual production of products from the C-12 Intermediates Unit shall be limited to the representations in the revised confidential information received by the Texas Commission on Environmental Quality (TCEQ) January 30, 2007. Daily production records of CDDT and CDD shall be made and maintained for a period of five years. The records shall be made available to authorized representatives of the TCEQ or local programs upon request. **(05/08)**

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7. Piping, Valves, Connectors, Pumps, Agitators, and Compressors - 28VHP

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 where the (1) 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:

- (1) piping and instrumentation diagram (PID); or
 - (2) a written or electronic database.
- 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.

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- 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 a cap, blind flange, plug, or a second valve to seal the line so that no leakage occurs. 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 24 hours. If the repair or replacement is not completed within 24 hours, the line or valve must have a cap, blind flange, plug, or second valve installed.

- 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.

A check of the reading of the pressure-sensing device to verify disc integrity shall be performed weekly and recorded in the unit log.

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. 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.

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- 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 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 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. Records of the first attempt to repair shall be maintained.
- 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 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 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.

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- 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. 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. **(05/08)**
8. The response factor of the gas analyzer for a specific VOC of interest as specified in paragraph 7F shall be determined by October 1, 2008. **(05/08)**
9. Storage tanks are subject to the following requirements. The control requirements specified in paragraphs A-D 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 95F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons. **(05/08)**
- A. 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.
 - B. 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.

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- C. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and seal gap measurements as 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 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.
- D. 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.
- E. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum. Storage tanks must be equipped with permanent submerged fill pipes.
- F. 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 for tanks shall be calculated using: the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."

- G. The permit holder shall maintain a record of tank throughput for the previous month and the past consecutive 12 month period for each tank.
10. Flare (EPN 10FLR-005) shall be designed and operated in accordance with the following requirements: **(05/08)**
- A. The flare system shall be designed such that the combined assist natural gas and waste stream to the flare meets the 40 CFR § 60.18 specifications of minimum heating value and maximum tip velocity under normal, upset, and maintenance flow conditions.

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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.
- D. The permit holder shall install a continuous flow monitor, hydrogen monitor, and Btu content analyzer that provides a record of the vent stream flow, hydrogen content, and Btu content to the Adiponitrile Flare (EPN 10FLR-005). The flow monitor sensor, hydrogen monitor, and analyzer sample points shall be installed 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, hydrogen content, and Btu content 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 ± 5.0 percent or ± 0.1 m/s, whichever is greater; the temperature monitor shall be ± 2.0 percent at absolute temperature; the pressure monitor shall be ± 5.0 mm Hg. The hydrogen analyzer shall be calibrated, installed, operated, and maintained, in accordance with manufacturer recommendations. The Btu content meter shall be calibrated, installed, operated, and maintained, in accordance with manufacturer recommendations, to continuously measure 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 rolling 12 month period. Actual exit velocity shall be determined in accordance with 40 CFR §60.18(f)(4).

- 11. Truck loading emissions shall be vented through a carbon adsorption system (CAS) designated as EPN 07LTR-016 and shall consist of at least two activated carbon beds that are connected in series. **(05/08)**
 - A. The CAS shall be sampled and recorded once every eighth truck loaded to determine breakthrough of VOC, provided that loading of a trailer occurs during a shift when personnel trained in sampling are working. If not, sampling will be done during the next loading operation when trained personnel are working. The sampling point shall be

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located at the outlet of the initial (primary) bed but before the inlet to the second (polishing) bed. Sampling shall be done during operating conditions reflecting maximum emission venting to the CAS.

- B. The method of VOC sampling and analysis shall be by flame ionization detector (FID), such as a Century OVA 128 Analyzer, or a TCEQ-approved equivalent. On each day that sampling is required, the FID shall be calibrated prior to sampling with a certified zero gas and certified 95 ppmv span gas.
- C. Breakthrough shall be defined as a measured VOC concentration of 10 ppmv measured at the exit of the primary bed. When breakthrough occurs, the primary bed shall be replaced or the polishing bed shall become the primary bed and a new polishing bed placed in series within 72 hours of detection of primary bed breakthrough or loading will be discontinued.
- D. Records of the CAS monitoring maintained at the plant site shall include the following:
 - (1) Sample time and date.
 - (2) Monitoring results (ppmv).
 - (3) Corrective action taken including the time and date of that action.
 - (4) Type of material being loaded into the trailer at time of sampling.

These records shall be made available to TCEQ personnel upon request and shall be retained for at least five years following the date that the data is obtained.

- E. As an alternative to sampling, the permittee may elect to automatically change out the beds after every 20 truck loadings.
12. Particulate matter grain loading shall not exceed 0.01 grain per dscf of air from any vent. There shall be no visible emissions exceeding 30 seconds in any six-minute period as determined using U.S. Environmental Protection Agency (EPA) Test Method 22. **(05/08)**

The vents covered by this permit shall not operate unless control devices and associated equipment are maintained in good working order and operating. All vents will be inspected for visible emissions once per day and a spare-parts filter inventory will be maintained on site. Records shall be maintained of all inspections and maintenance performed.

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The differential pressure across each baghouse shall be continuously monitored and be recorded at least once an hour.

Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 0.5 inches water gauge pressure or 0.5% of span.

Quality assured (or valid) data must be generated during normal operations except during the performance of a daily zero check. Loss of valid data due to periods of monitor breakdown, 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 hours) during normal operations over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

13. The cooling water (EPN 07CWA-041) shall be monitored monthly for six months and quarterly thereafter to detect leaks from heat exchangers. A minimum of three samples shall be taken at the entrance and each exit of processes Op 11 and Op 12 and analyzed for butadiene in accordance with the requirements of the TCEQ Sampling Procedures Manual, Appendix P (dated January 2003 or a later edition) or another air stripping method approved by the TCEQ Executive Director. **(05/08)**

A leak shall be defined as the exit mean concentration is greater than the entrance mean concentration using a one-sided statistical procedure at the 0.05 level of significance and the amount by which it is greater is at least 1 part per million or 10 percent of the entrance mean, whichever is greater. The leak shall be repaired as required by 40CFR 63.104(d). Delay of repair shall be allowed provided the requirements of 40 CFR 63.104(3) are satisfied.

14. The permit holder shall maintain and update monthly, an emissions record which includes calculated emissions of VOC from all loading operations over the previous rolling 12 month period. The record shall include the loading spot, control method used, quantity loaded in gallons, name of the liquid loaded, vapor molecular weight, and liquid throughput for the previous month and rolling 12 months to date. Emissions shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations."

All loading lines and connectors shall be visually inspected for any defects prior to hookup. Loading lines and connectors that are visibly damaged shall be removed from service. Loading operations shall cease immediately upon detection of any liquid leaking from the lines or connections.

15. The Operation 14 Vacuum Jet Vents (EPNs 07VNT-009 through 012) shall be routed to the APH Boilers 3 and 4 (EPN 15STK-006). These boilers are operated under TCEQ Air Quality Permit Number 812.

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LIST OF EXEMPTED C-12 INTERMEDIATES RELIEF DEVICES

<u>RV I.D. NUMBER</u>	<u>SERVICE</u>
3003 -7012 - 0401	BD Vaporizer
3007 - 7011 - 20.9	Trimer Reactor "A" RV
3007 - 7011 - 20.10	Trimer Reactor "B" RV
3004 - 7011 - 381	Organic Vapor Header
3004 - 7011 - 382	Organic Vapor Header
3004 - 7014 - 10.01, 10.02	Finishing Rx
3005 - 7011 - 0101	Kill Reactor
3006 - 7010 - 0101	UM Storage Tank
3006 - 7011 - 1.01	BTM Storage Tank
3004 - 7011 - 0601	UM Hold Up Tank
3004 - 7011 - 0701	BTM Holdup Tank
3007 - 7010 - 0101	Wiped Film Evaporator
3007 - 7011 - 0101	WFE Tails Tank
3007 - 7013 - 4.01	Preflash Sep Vaporizer
3007 - 7014 - 2.04	Preflash Vacuum System
3008 - 7012 - 0201	Flare Header Separator
3017 - 7010 - 0101	Topping Column Op 12
3017 - 7011 - 0101	Refiner Column Op 12
3018 - 7010 - 0109	Waster Gas Line Op 12
3018 - 7014 - 0201	Flash Separator
3018 - 8011 - 201	Hydrogen Off-Gas Scrubber
3027 - 7010 - 0101	Flasher Op 13
3027 - 7010 - 20-1	No. 2 Flasher Op 13
3027 - 7011 - 0101	Slurry Hut Relief Valve
3027 - 7011 - 1001	No. 2 Slurry Hut Relief Valve
3028 - 7010 - 0101	Oxidizer No. 1 Op 13
3028 - 7010 - 20-1	Oxidizer No. 3 Op 13
3028 - 7011 - 0101	Oxidizer No. 2 Op 13
3028 - 7011 - 20-1	Oxidizer No. 4 Op 13
3028 - 7014 - 20-1	A DCC Blower
3028 - 7014 - 21-1	B DCC Blower
3028 - 7014 - 22-1	C DCC Blower
3028 - 7015 - 0401	DCC Decanter
3029 - 7012 - 10.01	CAK Decanter
3039 - 7014 - 10	RDD Hut
3041 - 7100 - 1.01	Op 14 Jet Vent Separator
3043 - 7010 - 10-1	No. 2 WAK Hold-Up Tank
3043 - 7010 - 1-1	No. 1 WAK Hold-Up Tank
3043 - 7011 - 1000	No. 1 Stripper Op 14

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3043 - 7011 - 20-1	No. 2 Stripper OP 14
3043 - 7012 - 0101	Refiner Op 14
3043 - 7016 - 0101	Topper Op 14
3043 - 7011 - 8.2	No. 1 Stripper Jet After Condenser
3043 - 7012 - 10.02	Refiner Jet Condenser
3043 - 7012 - 2802	Refiner Condenser
3043 - 7016 - 10.02	Topper Jet Condenser
3007 - 7012 - 03PI	Wfe Jet Decanter
3014 - 7010 - 0102	CDT Storage Tank
3014 - 7011 - 0102	A PDT Storage Tank
3015 - 7011 - 0202	B PDT Storage Tank
3014 - 7011 - 0302	C PDT Storage Tank
3014 - 7012 - 0102	Topper Mk Stg. Tank
3014 - 7014 - 0105	Waste Organics Tank
3014 - 7015 - 0003	Cod Storage Tank
3014 - 7016 - 0003	Vch Storage Tank
3017 - 7012 - 02PI	Dist. Jet Decanter
3024 - 7010 - 0104	A CDD Receiver
3024 - 7010 - 0204	B CDD Receiver
3024 - 7011 - 0104	CDD Storage Tank
3039 - 7011 - 0103	F- Pak-Receiver
3039 - 7015 - 0102	A Pak Receiver
3039 - 7015 - 0202	B Pak Receiver
3039 - 7015 - 0302	C Pak Receiver
3039 - 7016 - 0102	Pak Hold-Up Tank
3039 - 7019 - 0102	Aqueous Waste Tank
3041 - 7005 - 0101	Building Decanter
3043 - 7014 - 0202	Residue Hold-Up Tank
3039 - 7010 - 0103	2nd Stage Decanter
3043 - 7011 - 38.03	No. 2 Stripper Jet After Condenser
HV1716.3	Preflash Jet Cond Vent
HV1716.4	Preflash Jet Cond Vent
HV1102-2	Dry Sol. Scrubber Vent To FA
HV1102-3	Dry Sol. Scrubber Vent To FA
HV1426-1	WFE Jet Cond. Vent To FA
HV2068-2	Refiner Jet Condenser Vent To FA
3201HV1	DCC Offgas Vent

Dated August 18, 2008

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 20011

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. 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 Name (3)	Emission Rates *	
			lb/hr	TPY**
10FLR-005	Adiponitrile Flare (5)	VOC	12.48	7.09
		NO _x	10.97	7.69
		CO	54.79	38.34
		NH ₃	1.01	0.57
07TFX-005	No. 1 WAK HUT	VOC	8.94	1.41
07TFX-005A	No. 2 WAK HUT	VOC	21.13	2.50
07VNT-008	Filter Jet Vent	NO _x	5.80	25.30
		CO	0.18	0.81
07FLT-013	Crude Filter Vent	NO _x	0.30	1.30
		CO	0.03	0.12
07LTR-016	Op. 11-12 Truck Loading	VOC	0.01	0.01
07LTR-015A	CDD andCDDA/K Truck Loading	VOC	1.40	1.05
07TFX-023	DCC Decanter	VOC	2.96	2.00
07TFX-024	2nd Stage Decanter	VOC	21.08	4.06
07TFX-025	NVR Residue Tank	VOC	3.40	0.13
07TFX-026A	DBW Tank A	VOC	0.01	0.01
		NO _x	0.01	0.01
		HNO ₃	0.01	0.01

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
07TFX-026B	DBW Tank B	VOC	0.01	0.01
		NO _x	0.01	0.01
		HNO ₃	0.01	0.01
07FLT-028	DDDA Rework Filter	PM	3.50	0.30
07VNT-029	Op. 15 Backup Vent (6)	NO _x	0.04	0.20
		CO	0.39	1.69
		SO ₂	0.01	0.04
07TFX-032A	PDT (CDDT) Receiver A	VOC	1.80	0.40
07TFX-032B	PDT (CDDT) Receiver B	VOC	1.80	0.40
07TFX-032C	PDT (CDDT) Receiver C	VOC	1.80	0.40
07TFX-032D	PDT (CDDT) Receiver D	VOC	1.80	0.40
07TFX-032E	PDT (CDDT) Receiver E	VOC	1.80	0.40
07TFX-032F	PDT Shore Tank	VOC	0.42	0.23
07TFX-033A	CDD Receiver A	VOC	0.94	0.47
07TFX-033B	CDD Receiver B	VOC	0.94	0.47
07TFX-034	CDD Storage Tank	VOC	11.06	0.85
07TFX-035	Scaletrol PDC9353 Tank	VOC	0.14	0.01
07TFX-036	OptiSpere CL2000 Tank	VOC	0.05	0.01
07TFX-037A	PAK Receiver A	VOC	4.42	0.23
07TFX-037B	PAK Receiver B	VOC	4.42	0.23

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
07TFX-037C	PAK Receiver C	VOC	4.42	0.23
07TFX-038A	PAK Storage A	VOC	4.42	0.32
07TFX-038B	PAK Storage B	VOC	4.42	0.26
07TFX-040	Organic HUT	VOC	36.43	6.05
07TFX-040A	EAW Neutralization Tank	VOC	0.02	0.01
07CWA-041	Cooling Water	VOC	0.84	2.39
07VNT-045	H2 Separator Vent	VOC	0.90	3.94
07TFX-051	Op. 11 Organic Hut	VOC	0.06	0.03
07TFX-053	WFE Jet Tank	VOC	0.01	0.01
07TFX-054	Clean Out Drum	VOC	0.01	0.01
07TFX-054A	Inhibitor Tank	VOC	0.01	0.01
07TFX-057	Op. 14 Aqueous Waste Decanter	VOC	8.84	2.33
07TFX-058	Op. 14 Building Decanter	VOC	0.02	0.01
18TFL-027	Class "A" Waste Tank	VOC	0.16	0.74
18TFX-028	B Aqueous Waste Tank	VOC	0.01	0.01
		HNO ₃	4.32	1.18
18TFL-030	Class "A" Oil Tank	VOC	0.03	0.04

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
18TFX-061	CSM Tank	VOC	0.01	0.01
		HNO ₃	0.72	0.23
07LTR-026C	DBW Truck Loading	VOC	0.01	0.01
		NO _x	0.01	0.01
		HNO ₃	0.01	0.01
18TFX-062	Unloading Tank	VOC	0.01	0.01
		HNO ₃	0.01	0.01
18TFX-062A	RF Separator	VOC	0.01	0.01
		HNO ₃	0.01	0.01
18SMP-63	Settler Sump	VOC	0.01	0.01
18TFL-065	Class A/B Swing Oil Service	VOC	0.03	0.04
		HNO ₃	0.08	0.22
18TFX-072	Waste Collection Tank	VOC	0.01	0.01
		PM	0.01	0.01
		HNO ₃	0.01	0.01
18TFX-073	Waste Equalization Tank	VOC	0.01	0.01
18SEP-075	A Tank Oil/Water Separator	VOC	0.01	0.01
18SMP-736	Unloading Sump	VOC	0.01	0.02
18SMP-737	Acids Waste Sump	VOC	0.01	0.01
		HNO ₃	0.01	0.01
07SMP-011	Op. 11 Sump	VOC	0.01	0.01
07SMP-011A	Op. 11A Sump	VOC	0.01	0.01
07SMP-012	Op. 12 Sump	VOC	0.01	0.01

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
07SMP-013	Op. 13 Sump	VOC	0.01	0.01
07SMP-014	Op. 14 Sump	VOC	0.01	0.01
07SMP-015	Op. 15 and 16 Sumps	VOC	0.01	0.01
		HNO ₃	0.04	0.01
07SMP-016	Op. 16 Sump	VOC	0.01	0.01
		HNO ₃	0.04	0.01
07FUG	Fugitive Emissions (4)	VOC	6.90	30.10
07TFX-636A	Urea Mix Tank	VOC	0.02	0.01
07TFX-636	Urea Solution Tank	VOC	0.03	0.01
07LTR-025A	NVR Truck Loading	VOC	0.16	0.02
07LTR-028A	DDDA Transloading	PM	0.11	0.01
07RSY-026F	DBW H2 Reactor	NH ₃	0.01	0.01
		CO	0.01	0.01
07DIS-026G	DBW Flash Dryer	NH ₃	0.01	0.01
		CO	0.01	0.01
07DIS-512	No. 1 Flash Dryer Vent	VOC	0.02	0.07

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (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 carbons as defined in Title 30 Texas Administrative Code § 101.1
NO_x - total oxides of nitrogen
CO - carbon monoxide
PM - particulate matter
NH₃ - ammonia
HNO₃ - nitric acid
H₃BO₃ - boric acid
- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.
- (5) Routine emissions attributable to this facility.
- (6) Pilot emissions only

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/year 8,760

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated August 18, 2008