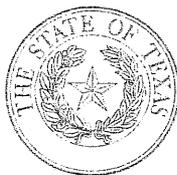


2008 APR 28 PM 4:29

CHIEF CLERKS OFFICE

Buddy Garcia, *Chairman*
Larry R. Soward, *Commissioner*
Bryan W. Shaw, Ph.D., *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 28, 2008

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

Re: Huntsman Petrochemical Corporation, Application for Amendment and Renewal of Air
Quality Permit No. 420160
TCEQ Docket No. 2008-0292-AIR

Dear Ms. Castañuela:

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- Final Draft Permit, including any special provisions or conditions
- Maximum Allowable Emission Rate Table (MAERT)
- The summary of the technical review of the permit application
- MERA Flowchart Summary
- The compliance summary of the applicant.

If you have any questions, please do not hesitate to call me at extension 0891.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Browning", written over a large, stylized flourish.

Amy L. Browning
Staff Attorney
Environmental Law Division

Enclosure

Permit Renewal & Amendment Source Analysis & Technical Review

Company:	Huntsman Petrochemical Corporation	Permit No.:	20160
City:	Port Neches	Project No.:	123876 & 123875
County:	Jefferson	Account No.:	JE-0052-V
Project Type:	CAMD/REW	Regulated Entity No.:	RN100219252
Project Reviewer:	Mr. Troy Dalton	Customer Reference No.:	CN600632848
Facility Name:	Propylene Oxide/methyl Tertiary Butyl Ether (po/mtbe) Production Unit		

Authorization Checklist

Will a new policy/precedent be established? (ED signature required if yes) No

Is a state or local official opposed to the permit?(ED signature required if yes) No

If yes, please provide name and title of official:

Is waste or tire derived fuel involved? (ED signature required if yes) No

Are waste management facilities involved?(ED signature required if yes) 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

Renewal and incorporation of PBR & Standard Permit authorizations along with an amendment to change representations relating to emissions to the Ground Flare, Dock Flare and the Catalyst Prep Scrubber.

Compliance History

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: 12/12/06

The compliance period was from 9/1/02 to 8/31/07

Was the application received after September 1, 2002? Yes

If yes, what was the site rating & classification? 40.52/Avg Company rating & classification? 6.86/Avg

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

Public Notice Information RENEWAL

§ 39.403 Public notification required? Yes

§ 39.418 C. Date 1st Public Notice /Admin Complete/Legislators letters mailed: 8/3/06

§ 39.603 D. Pollutants: Organic compounds, NOx, SO2, CO, NH3, PM10

E. Date Published: 8/25/2006 in Beaumont Enterprise

Date Affidavits/Copies received: Yes

F. Bilingual notice required? No

§ 39.604 G. Certification of Sign Posting / Application availability Yes

H. Public Comments Received? Yes

Meeting requested? No

Hearing requested? Yes Hearing held?

Was/were the request(s) withdrawn? No

Replies to Comments sent to OCC: 10/18/07

Public Notification - AMENDMENT

§ 39.403 Public notification required? Yes

§ 39.418 C. Date 1st Public Notice /Admin Complete/Legislators letters mailed: 8/3/06

§ 39.603 D. Pollutants: NOx, SO2, CO, NH3, PM10

E. Date Published: 8/25/2006 in Beaumont Enterprise

Date Affidavits/Copies received: Yes

Renewal/Amendment Technical Review

Permit No.20160

Regulated Entity No.RN100219252

- F. Bilingual notice required? No
Date Affidavits/Copies received: 7/10/07
- § 39.604 G. Certification of Sign Posting / Application availability Yes
- H. Public Comments Received? see above for renewal
- § 39.419 2nd Public Notification required? Yes
A. Date 2nd Public Notice mailed: 11/1/07
B. Preliminary determination 11/1/07
- § 39.603 C. Pollutants: NOx, SO2, CO, NH3, PM10
- D. Date Published: 11/26/07 in Beaumont Enterprise
Date Affidavits/Copies received: 1/2/08
- E. Bilingual notice required? No
- F. Public Comments Received? No
Meeting requested? No
Hearing requested? No

30 TAC Chapter 116 Rules - Renewal Requirements

- § 116.315(b) Date of expiration of permit? 8/15/06
- § 116.310 Date written notice of review was mailed 10/27/05
- § 116.310 Date application for Renewal (PI-1R) received? 7/27/06
- § 116.311(a)(1) Do dockside vessel emissions associated with the facility comply with all regulations? Yes
- § 116.311(a)(2) Is the facility being operated in accordance with all requirements 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
Subparts A, Db, Kb, VV, NNN & RRR
- § 116.311(a)(4) Compliance with applicable NESHAPS? N/A
- § 116.311(a)(5) Compliance with applicable NESHAPS(MACT) for source categories? Yes
Subparts A, F, G & QQ
- § 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
- § 116.314(a) The facility meets all permit renewal requirements? Yes
- § 116.313 Permit Renewal Fee: \$ 9,147.56 Paid? Yes

30 TAC Chapter 116 Rules - Amendment Requirements

Emission Controls

- § 116.111(2)(C) Will the facility utilize BACT? Yes
- § 116.111(2)(G) Is the facility expected to perform as represented in the application? Yes
- § 116.140 Permit Fee: \$ 900.00 Fee certification provided? Yes

Sampling And Testing

- § 116.111(2)(A)(i) Are the emissions expected to comply with all TCEQ air quality Rules & Regs, and the intent of the Texas Clean Air Act? Yes
- § 116.111(2)(B) Will emissions be measured? Yes
Method: Calculation and testing (cooling tower)

Federal Program Applicability

- § 116.111(2)(D) Compliance with applicable NSPS expected? Yes
Subparts A, Db, Kb, VV, NNN & RRR
- § 116.111(2)(E) Compliance with applicable NESHAPS expected? N/A

Renewal/Amendment Technical Review

Permit No. 20160

Regulated Entity No. RN100219252

- § 116.111(2)(F) Compliance with applicable MACT expected? Yes
Subparts A, F, G & QQ
- § 116.111(2)(H) Is nonattainment review required? No
A. Is the site located in a nonattainment area? Yes
B. Is the site a federal major source for a nonattainment pollutant? Yes
C. Is the project a federal major source for a nonattainment pollutant by itself? No
D. Is the project a federal major modification for a nonattainment pollutant? No
- § 116.111(2)(I) Is PSD applicable? No

Mass Cap and Trade Applicability

- § 116.111(a)(2)(L) Is Mass Cap and Trade applicable? No

Request for Comments

Region: 10

Reviewed By: Roddy White

Process Description

The facilities in this permit are segments in the propylene oxide (PO) and methyl tertiary butyl ether (MTBE) manufacturing process:

Isobutane purification made up of the depropanizer and butane splitter towers. In the peroxidation reactors, isobutane and oxygen are reacted to form tertiary butyl alcohol (TBA) and tertiary butyl hydroperoxide (TBHP). These compounds are separated with isobutane, recycle product and TBHP. The TBA and TBHP are concentrated and separated. TBA is purified and TBHP is sent to the Epoxidation unit. Process water is either sent for recovery of MTBE or sent to the wastewater treatment system.

The Epoxidation unit combines the TBHP with propylene in the presence of a molybdenum catalyst to form PO and TBA. The PO and unreacted propylene are sent to the primary fractionator. The catalyst is prepared in a batch reactor with the addition of ethylene glycol. The stream from the Epoxidation reactors is sent to fractionation columns where PO and propylene are removed. Crude PO are sent for purification. Recovered propylene is recycled.

Crude TBA is sent to a series of distillation columns where TBA removal, recovery and catalyst residue concentration occurs. The TBA is reacted with methanol to form MTBE.

Wastewater at the PO/MTBE plant consists of partially treated process wastewater (the process water is run through a coalescer and wastewater sphere to remove insoluble organics, and a steam stripper to remove soluble organics), cooling tower blowdowns, boiler blowdowns, and stormwater runoff. The wastewater flows into the DOW sump and surges overflow into the lined aerated DOW pond. Water from the sump/pond is pumped to the JWWTW.

Pollution Prevention, Sources, Controls and BACT [§116.111(a)(2)(C)]

Federal regulations have been added, SC 4 & 5.

Old SC 4, 5 & 11 deleted, these requirements have been met. SC 5 was designed for initial startup and the fuel limitations for the steam generators has been added in new SC 10.

SC 12 addressing the ground flare has been updated with current requirements. The ground flare basic operation has EPA approval.

BACT requirements have been added for all tanks associated with this permit, SC 20 & 21.

New SC 13 - Emissions from the Dock Flare, RSELDFLR, were recalculated as follows: emissions with a destruction efficiency of 99% for propylene oxide, ideal gas law was used to calculate barge depressurizations prior to loading, and the number of barge loadings was decreased. A limitation on the number of barge loading was added to SC 19. No changes to the method of operation therefore BTU

Renewal/Amendment Technical Review

Permit No.20160

Regulated Entity No.RN100219252

monitoring was not required. The increase in SO2 emissions was a correction in the natural gas sulfur content.

New fugitive language has been added to reflect changes in fugitive components and emissions, SC 14, 15 and 16 (replaces old SC 13 and 14). SC 16 addresses a plugging concern.

Language regarding Carbon Compound Waste Gas Streams, old SC 15.A. has been removed.

BACT for cooling towers has been added, SC 17.

Old SC 16 & 17 have been updated, new SC 18, 19 & 21.

Old SC 18 & 19, new SC 22 & 23. The current configuration of the wastewater sump, DOW Sump/Pond, EPN PODOWSUMP, does not meet BACT standards. The existing permit required Huntsman will hard pipe PO/MTBE process wastewater directly to the JWWTP within three years of approval of this amendment. This condition has been modified to add a firm date for compliance. The date chosen is within the 3 year period required by the existing permit. In addition the MSS activities have been identified and current MSS language has been added.

CAM language has been added, SC 24.

There has been no change to the Catalyst Prep Scrubber, POCATNH3. The scrubber only controls NH3, the added VOC (ethylene glycol) emissions had not been included in the prior permit, they are no new emissions or operational changes. There is no claim of scrubber control for VOC.

Impacts Evaluation

- 1. Was modeling done? Yes Type? Screen and Refined
- 2. Will GLC of any air contaminant cause violation of NAAQS? No
- 3. Is this a sensitive location with respect to nuisance? No
- 4. Is the site within 3000 feet of any school? No
- 5. Toxics Evaluation: Impacts are acceptable, see MERA.

Miscellaneous

Is applicant in agreement with special conditions? Yes

Company representative(s)? Mike C. Miller

Contacted via? e-mail

Date of contact? 8/3/07

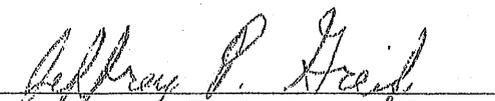
Other permit(s) affected by this action?

If YES, list permit number(s) and actions required or taken: all were incorporated into this permit and voided

- 40374 40375 40374 42348 42458 42720 43143
- 44165 44164 44295 44123 44125 44124 44555
- 44556 45198 45089 45663 45664 47422 48001
- 47039 50328 54328 55261 74511 76950


Project Reviewer

1/29/08
Date


Team Leader/Section Manager/Backup

1/29/08
Date

IERA FLOWCHART SUMMARY RM

Company: Huntsman Petrochemical Corporation		Permit Number: 20160		
Regulated Entity Number: RN100219252		Project Number: 123875		
EFFECTS REVIEW PERFORMED BY PERMIT ENGINEER:			YES	NO
1.	Was the project a decrease in annual emissions with no increase in short-term emissions?			X
2.	Was the proposed facility on the TARA Emissions Screening List?			X
3.	Did the proposed project involve an increase of a special interest constituent? If YES, which location? If YES, which constituent?			X
4A.	Was the project increase < 0.04 lb/hr and the ESL \geq 2 $\mu\text{g}/\text{m}^3$? List constituent(s):	X		
acetaldehyde, acetic acid, acetone, allyl t butyl peroxide, argon, butane, 2-butanone, DME, DTBE, DTBP, ethylene, EG monoformate, EG monopropyl, EG monopropyl ether, EGME, formic acid, glycol ethers, heptane, hexane, isobutylene, isobutyl alcohol, 1-butyric acid, 1-octane, isopropyl alcohol, isopentane, methanol, MIKE, methyl formate, 2-methyl, 1-pentene, 4-methyl, 1-pentene, MTBE, molybdenum, pentane, propionaldehyde, propylene glycol, TBF				
4B.	Was the project increase < 0.04 lb/hr and the ESL < 2 $\mu\text{g}/\text{m}^3$? If YES, TARA comments required to complete impacts review. List constituent(s):			X
5.	Was the emission increase impact, (X)(E), less than 0.1 ESL? tertiary-butanol	X		
6.	Did the project involve an acceptable constituent substitution? Original constituent(s): MTBE & propane glycol monoethyl ether Replacement constituent(s): isobutane, tertiary butyl hydroperoxide	X		
REDUCTION OPTION:			YES	NO
7.	Did the project result in an acceptable net reduction?*			
A.	Was the reduction \geq 6 : 1? propylene	X		
B.	Was the reduction \geq 4 : 1 and D 500?			
C.	Was there an improvement in impact? *For each constituent, discuss evaluation of net reduction for acceptability.			
<u>Constituent</u>		<u>Reduction Evaluation</u>		
MODELING RESULTS:			YES	NO
8.	Were new and increased emissions modeled? Screening? Refined? List constituent(s): ethylene glycol List GLCmax: 34.31	X X X		
9A.	Was the GLCmax for this project \leq 10% ESL?*	X		
List constituent(s):				
List % of ESL:				
9B.	Were cumulative concentrations from all projects 25% ESL?*			
List constituent(s):				
* For each constituent, list the cumulative percentage of the ESL since the baseline date.				
<u>Constituent</u>		<u>Baseline Date</u>		<u>Cumulative % of ESL</u>
10.	Ratio test acceptable? GLC/ESL ratio: <u>Constituent</u>	<u>En/Et-Ratio</u>		
<u>GLC/ESL Ratio</u>				
MODELING RESULTS (CONT'D):			YES	NO
11A.	Site-wide refined modeling Screening? Refined? If YES, list the constituent(s):			
11B.	Ambient monitoring? If YES, list the constituent(s):			
SUMMARY BY PERMIT REVIEWER: Discuss determination of acceptability for each constituent using criteria outlined above.				

Permit Reviewer:

Date:

Team Leader/Section Manager/Backup:

Date:

The following information was obtained from a review of the files of the [redacted] and is being provided to you for your information. This information is being provided to you on a confidential basis and is not to be disseminated outside of your office without the express written approval of the [redacted].

The [redacted] has been advised that [redacted] has been identified as a [redacted] of the [redacted]. It is noted that [redacted] has been identified as a [redacted] of the [redacted] and is being provided to you for your information. This information is being provided to you on a confidential basis and is not to be disseminated outside of your office without the express written approval of the [redacted].

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AIR QUALITY PERMIT

A PERMIT IS HEREBY ISSUED TO

Huntsman Petrochemical Corporation

AUTHORIZING THE CONTINUED OPERATION OF

Propylene Oxide/Methyl-Tertiary-Butyl-Ether Production Unit

LOCATED AT Port Neches, Jefferson County, Texas

LATITUDE 29° 58' 05" LONGITUDE 093° 55' 35"



Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]

Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]

Construction Progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]

Start-up Notification. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]

Sampling Requirements. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]

Equivalency of Methods. The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]

Recordkeeping. 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; keep all required records 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; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

Maximum Allowable Emission Rates. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]

Maintenance of Emission Control. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]

Compliance with Rules. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]

This permit may be appealed pursuant to 30 TAC § 50.139.

This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]

There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]

Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

SPECIAL CONDITIONS

Permit Number 20160

OPERATIONAL LIMITATIONS

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 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. (3/06)
3. This permit authorizes the production of methyl-tertiary-butyl ether (MTBE) and propylene oxide (PO) up to the rates shown in the confidential section of the July 2006 permit amendment application. In order to assure compliance, records shall be kept of daily production rates (pounds per day) and the cumulative rolling 12-month production total (pounds). (2/08)

FEDERAL REQUIREMENTS

4. 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) for Subpart A, General Provisions; Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units; 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; Subpart VV, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI); Subpart NNN, Standards of Performance for VOC Emissions from SOCMI Distillation Operations; and Subpart RRR, Standards of Performance for VOC Emissions from SOCMI Reactor Processes. (2/08)

SPECIAL CONDITIONS

Permit Number 20160

Page 2

5. These facilities shall comply with all applicable requirements of EPA regulations on National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Source Categories promulgated in 40 CFR Part 63 for Subpart A, General Provisions; Subpart F, National Emission Standards for Organic Hazardous Air Pollutants from the SOCMII; Subpart G, National Emission Standards for Organic Hazardous Air Pollutants from the SOCMII for Process Vents, Storage Vessels, Transfer Operations, and Wastewater; and Subpart QQ, National Emissions Standards for Surface Impoundments. (2/08)

STACK SAMPLING REQUIREMENTS

6. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants emitted into the atmosphere from Steam Generators (Emission Point No. [EPN] STEAMGEN) and Boiler (EPN HK-F5-003). The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the EPA Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for 40 CFR Part 60 testing which must have EPA approval shall be submitted to the TCEQ Office of Compliance and Enforcement (OCE), Compliance Support Division.

- A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:
 - (1) Proposed 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.

SPECIAL CONDITIONS

Permit Number 20160

Page 3

- (6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.
- (7) Procedure/parameters to be used to determine worst case emissions during the sampling period.

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 the test reports. The TCEQ Regional Director or the TCEQ OCE, Compliance Support Division must approve any deviation from specified sampling procedures.

- B. Tests for air contaminants emitted from Steam Generators (EPN STEAMGEN) and Boiler (EPN HK-F5-003) include (but are not limited to) nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM) with a mean aerodynamic diameter of less than 10 microns, and VOC.
- C. Sampling shall occur within 60 days of such times required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate TCEQ Regional Office.
- D. The facility being sampled shall operate at levels that are expected to cause maximum emissions for each air contaminate required to be tested, during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

During subsequent operations, if the process parameter(s) established for the compliance testing is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.

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CHIEF CLERKS OFFICE

- E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the appropriate TCEQ Regional Office.
One copy to each local air pollution control program.
One copy to the TCEQ OCE, Compliance Support Division, Austin. (2/08)

CONTINUOUS DETERMINATION OF COMPLIANCE

7. The holder of this permit shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of NO_x from the Steam Generators (EPN STEAMGEN) and the Boiler (EPN HK-F5-003). (4/99)

- A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division for requirements to be met.
- B. The system shall be zeroed and spanned daily, and corrective action taken when the 24-hour span drift exceeds two times the amounts specified in 40 CFR Part 60, Appendix B, or as specified by the TCEQ, if not specified in Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days. If the monitor is required by a subpart of New Source Performance Standards (NSPS) or NESHAPS, then zero and span shall be done daily without exception.

Each monitor shall be quality-assured at least quarterly in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2. For non-NSPS sources, an equivalent method approved by the TCEQ may be used.

All cylinder gas audit exceedances of ±15 percent accuracy and any CEMS downtime shall be reported to the appropriate TCEQ Regional Director, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

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- C. The monitoring data shall be reduced to hourly average concentrations at least once everyday, using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emission rate in pounds per hour and pounds per MMBTU (lb/MMBTU) at least once every month.
- D. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made available to the TCEQ Executive Director or his designated representative upon request. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.
- E. For NSPS sources subject to Appendix F, the appropriate TCEQ Regional Office shall be notified at least 30 days prior to each annual relative accuracy testing audit in order to provide them the opportunity to observe the testing.
- F. Compliance with the SO₂ limit of this permit for the Boiler (EPN HK-F5-003) shall be demonstrated on the basis of a certification from the fuel supplier validating the quantity of hydrogen sulfide (H₂S) and total sulfur in the natural gas. The certification should be compared with the H₂S and total sulfur limits specified in Special Condition No. 11B to determine compliance with the SO₂ limits of this permit for the boiler. (4/99)
- G. Compliance with the opacity limit of Special Condition No. 11C shall be demonstrated using EPA Reference Method 9.
- 8. The Ammonia Scrubber (EPN POCATNH3) shall be operated so that there are no ammonia odors from the vent on or off the plant site. (1/98)

STEAM GENERATOR/BOILER PERFORMANCE

- 9. Emissions from Steam Generators 1 and 2 shall not exceed the following:
 - A. 0.08 lb NO_x/MMBTU of heat input on an hourly average;
 - B. 0.009 lb PM/MMBTU of heat input on an hourly average;

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- C. In-stack concentrations of 25 parts per million by volume (ppmv) VOC on an hourly average and a VOC destruction efficiency greater than or equal to 99.99 percent on an hourly average; and
- D. In-stack concentrations of CO from the steam generators shall not exceed 100 ppmvd, corrected to 7 percent oxygen (O₂) on an hourly average. Compliance with the CO emission standards (corrected ppmv and pounds per hour) shall be determined on an hourly rolling average basis using:
 - (1) The CO data from the CEMS installed on each stack;
 - (2) The volumetric percent of stack O₂ on a dry basis;
 - (3) The firing rate of the steam generators; and
 - (4) The F-factor of the fuel.

This condition does not in any way preclude compliance with all applicable BIF regulations.

- 10. Steam Generators 1 and 2 shall be fired with natural gas containing no more than 2 grains of total sulfur per 100 dry standard cubic feet (dscf). (2/08)
- 11. A. Emissions from the Boiler (EPN HK-F5-003) shall not exceed the following: (4/99)
 - (1) 0.05 lb NO_x/MM BTU of heat input on an hourly average;
 - (2) 0.01 lb PM/MM BTU of heat input on an hourly average;
 - (3) 0.003 lb VOC/MM BTU of heat input on an hourly average;
 - (4) 100 ppmvd of CO, corrected to 3 percent O₂ on an hourly average.
- B. Fuel used in the Boiler (EPN HK-F5-003) shall be limited to pipeline-quality natural gas and/or vent gas. The natural gas shall contain no more than 0.25 grain of H₂S and 2 grains of total sulfur per 100 dscf. The quantity of sulfur and H₂S in the vent gas shall not exceed the quantity of these chemicals in the pipeline-quality, sweet natural gas. (2/08)
- C. Opacity of emissions from the Boiler (EPN HK-F5-003) must not exceed 20 percent averaged over a six-minute period except for those periods described in Title 30 Texas Administrative Code (30 TAC) § 111.111(a)(1)(E). (4/99)

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PO GROUND FLARE PERFORMANCE

12. The PO Ground Flare (EPN POFLARE) shall be designed and operated in accordance with the following requirements:

- A. PO ground flare shall be designed and operated such that the gas combusted at the flare tips shall have a minimum heating value of at least 600 Btu/scf under normal, upset, and maintenance flow conditions.

The heating value and velocity requirements shall be satisfied during operations authorized by this permit. Flare testing may be requested by the appropriate TCEQ Regional Office to demonstrate compliance with these requirements.

- B. The PO Ground 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 equivalent infrared or ultraviolet scanner. 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. For the PO Ground Flare, the holder of this permit shall install and operate a continuous flow monitor and calorimeter that provides a record of the vent gas stream net heating value at the low-pressure flare tips. Average hourly values of the flow and the net heating value shall be recorded each hour. The monitors' sample points shall be installed in the low pressure flare section 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.

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

- F. The calorimeter 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 low-pressure flare, in Btu/standard cubic foot of the gas.

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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. (2/08)

DOCK FLARE PERFORMANCE

13. Dock Flare (EPN RSELDFLR) shall be designed and operated in accordance with the following requirements:

- A. The flare system 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. (2/08)

PIPING, VALVES, CONNECTORS, PUMPS, AGITATORS AND COMPRESSORS, IN CONTACT WITH VOC - INTENSIVE DIRECTED MAINTENANCE - 28MID

14. 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 where the concentration of VOC in the stream has an aggregate partial pressure or vapor pressure of less than 0.044 pound per square inch, absolute (psia) at 68°F or 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 available upon request.

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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, agitators, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute (API), 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. 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 30 TAC Chapter 115, shall be identified in a list to be made 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.
- 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 8 hours 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.

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- 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. 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.

An approved 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.

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. A first attempt to repair the leak must be made within 5 days. Records of the first attempt to repair shall be 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.

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All other pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly.

H. 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. 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. 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. 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.

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- J. The percent of valves leaking used in paragraph I shall be determined using the following formula:

$$(Vl + Vs) \times 100/Vt = Vp$$

Where:

Vl = 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 nonaccessible and unsafe-to-monitor valves.

Vp = the percentage of leaking valves for the monitoring period.

- K. 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.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable NSPS, or an applicable NESHAPS and does not constitute approval of alternative standards for these regulations. (2/08)
15. In addition to the weekly physical inspection required by Item E of Special Condition No. 14, all accessible connectors in 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. 14.
- A. In lieu of the monitoring frequency specified in paragraph 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.

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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 B shall be determined using the following formula:

$$(C1 + Cs) \times 100/Ct = Cp$$

Where:

C1 = 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. (2/08)

16. The requirements of Special Condition No. 14E, that 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, does not apply to lines or valves in the PO/MTBE Unit which contain more than 1 weight percent tertiary butyl hydroperoxide. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made available upon request.

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

- A. PID or
B. A written or electronic database. (2/08)

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COOLING TOWER

17. The VOC associated with the Cooling Tower (EPN CTFUG) 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 two VOC monitored results.

Cooling water VOC concentrations above 0.08 ppmw indicate faulty equipment. Equipment shall be maintained so as to minimize VOC emissions into the cooling water. Faulty equipment shall be repaired at the earliest opportunity but no later than the next scheduled shutdown of the process unit in which the leak occurs.

Emissions from the cooling tower are not authorized if the VOC concentration of the water returning to the cooling tower exceeds 0.8 ppmw. The VOC concentrations above 0.08 ppmw are not subject to extensions for delay of repair under this permit condition. The results of the monitoring and maintenance efforts shall be recorded. (2/08)

LOADING

18. Loading of PO is limited to tank trucks, railcars, barges, and ships by pressurized loading. Vapor resulting from loading shall be fed to the recovery system via a vapor line and recycled to the pressure storage tanks. Vapor line pressure shall be at least 8.0 psig pressure for tank trucks, railcar, and barge loading and no more than 1.6 psig pressure for ship loading. Unrecovered PO, vapor resulting from loading of barges and ships, and inerts shall be sent to the flare with a minimum of 99 percent destruction. Loading of MTBE from this unit is limited to pipeline only. (2/08)
19. The holder of this permit shall not load more than 97 barges with PO in any rolling 12-month period. Records of barges loaded with PO will be totaled for each month and a rolling 12-month total will be calculated each month. (2/08)

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STORAGE

20. The tanks listed below are limited to storing the following liquids:

<u>EPN</u>	<u>Service</u>
POTK001	catalyst solution
POTK003	catalyst solution
POTK007	butanol, tertiary - heated to a maximum of 150°F
POTK008	butanol, tertiary - heated to a maximum of 150°F
POTK009	isooctane
T-O-79	ethylene glycol monomethyl ether

21. 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 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.

- 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. 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 (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.
- C. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998, or an equivalent degree of flotation, 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. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum. Storage tanks must be equipped with permanent submerged fill pipes.

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- 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 for tanks shall be calculated using: the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks." (2/08)

22. This permit authorizes emissions from DOW Sump/Pond (EPN PODOWSUMP) for the following planned maintenance, start-up, and shutdown (MSS) activities:

Cleaning, inspection, and/or repair of the blend box, piping pumps, and other components associated with the PO/DOW Sump/Pond.

Maintenance, start-up, and shutdown activities not in the above list are not authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the MAERT. The PO/MTBE wastewater pump maintenance and Wastewater Treatment Plant maintenance shall occur no more than 440 hours per year. The performance of each maintenance activity and the emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis. These records shall include at least the following information:

- A. The physical location at which emissions from the MSS activity occurred including the emission point number, common name, and any other identifier for the point at which the emissions were released into the atmosphere.
- B. The type of planned MSS activity and the reason for the planned activity.
- C. The common name and the facility identification number of the facilities at which the MSS activity and emissions occurred.
- D. The date and time of the MSS activity and its duration.

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- E. The estimated quantity of each air contaminant, or mixture of air contaminants, emitted shall be determined with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the renewal application, PI-1 dated July 25, 2006, consistent with good engineering practice. (2/08)
23. No later than June 30, 2008, the permit holder shall control PO/MTBE wastewater emissions by routing the wastewater (closed conveyance) to the Joint Wastewater Treatment Plant (JWWTP) operated under Permit Number 49247. Afterward, the DOW Sump/pond, EPN PODOWSUMP, shall be used only for short-term storage of wastewater generated from storm events and maintenance activities described in Special Condition No. 22.
- Authorization for JWWTP emission increases due to this action shall be obtained prior to the PO/MTBE wastewater being accepted at the JWWTP. Authorization may be obtained through an amendment action to Permit Number 49247 or an appropriate 30 TAC Chapter 106 authorization. (3/06)

COMPLIANCE ASSURANCE MONITORING

24. The following requirements apply to capture systems PO Ground Flare (EPN POFLARE) and Dock Flare (EPN RSELDFLR).
- A. 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.
 - B. The control devices shall not have a bypass.
 - C. If any of the above inspections is not satisfactory, the permit holder shall promptly take necessary corrective action and a deviation shall be reported if the monitoring or inspections indicate bypass of the control device. (2/08)

Date

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 20160

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 **
POFLARE	PO Ground Flare	NO _x	7.90	6.97
		CO	57.02	50.34
		VOC	97.00	32.91
		SO ₂	0.09	0.38
HK-F5-003	Boiler	NO _x	14.26	62.44
		CO	20.77	90.98
		VOC	0.86	3.75
		SO ₂	1.60	6.99
		PM ₁₀	2.85	12.49
STEAMGEN	Steam Generator Nos. 1 and 2	NO _x	28.60	125.20
		CO	28.57	37.34
		VOC	2.86	6.05
		SO ₂	1.89	3.51
		PM ₁₀	3.22	14.11
PODUST	Catalyst Prep Dust Filter	PM ₁₀	0.01	0.01
POCATNH3	Catalyst Prep Scrubber	NH ₃	0.01	0.01
		VOC	0.09	0.02
POTK001	Catalyst Solution Tank	VOC	1.49	0.05
POTK003	Catalyst Solution Tank	VOC	1.49	0.05
POTK007	TBA Day Tank	VOC	0.33	1.46
POTK008	Dry TBA Tank	VOC	0.43	1.89

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**
POTK009	I-Octane Tank	VOC	0.13	0.59
POPERFUG	Peroxidation Unit (4)	VOC	0.67	2.92
POEPOFUG	Epoxidation Unit (4)	VOC	0.48	2.12
POPURFUG	PO Purification Unit (4)	VOC	0.43	1.88
POMTFUG	MTBE One-Step Unit (4)	VOC	0.37	1.62
POCPFUG	Catalyst Prep Area (4)	VOC	0.15	0.67
POTRAFUG	TBA Removal Area (4)	VOC	0.28	1.21
POCRFUG	Catalyst Recovery (4)	VOC	0.13	0.55
POPRFUG	Propylene Refrigeration Area (4)	VOC	0.10	0.44
MTBFUG-2	MTBE Synth. Unit (4)	VOC	0.20	0.88
WWSFUG	Wastewater Stripper (4)	VOC	0.07	0.30
POLODFUG	Railcar/Tankwagon Loading (4)	VOC	0.06	0.24
RSELDSFUG	Barge Loading (4)	VOC	0.02	0.08
TKEFUG	PO/MTBE Tankage (4)	VOC	0.24	1.05
BUTFUG	Butane Bullets (4)	VOC	0.04	0.18
MTBEFUG	MTBE Storage (4)	VOC	0.05	0.20
SGFUG	Steam Generators Area (4)	VOC	0.06	0.25

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**
CTFUG	Cooling Tower (4)	NH ₃	0.08	0.33
		VOC	5.80	23.57
RSELDFLR	Dock Flare	NO _x	4.53	2.69
		CO	9.04	5.36
		SO ₂	0.04	0.01
		VOC	12.37	3.87
PODOWSUMP	Wastewater Sump/Pond (5)	NH ₃	0.04	0.01
		VOC	28.12	22.59
PODOWSUMP	Wastewater Sump/Pond (6)	NH ₃	0.01	0.01
		VOC	18.20	3.35
T-O-79	EGME Tank	VOC	0.02	0.05
CRFUG	Catalyst Recycle Fugitives (4)	VOC	0.06	0.25
EGMEFUG	EGME Storage Fugitives (4)	VOC	0.10	0.44
PRCOFUG	Propylene Recovery Column Overhead (4)	VOC	0.07	0.30
PROFUG	Propylene Recovery Overhead (4)	VOC	0.14	0.61
POFUG	PO Fugitives (4)	VOC	0.04	0.19
POFUG-1	PO Fugitives (4) (Primary Fractionator)	VOC	0.01	0.04
POFUG-2	PO Fugitives (T&I) (4)	VOC	0.21	0.93

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) NO_x - total oxides of nitrogen
CO - carbon monoxide
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
SO₂ - sulfur dioxide
PM₁₀ - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no PM greater than 10 microns is emitted.
NH₃ - ammonia
- (4) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (5) Maintenance/start-up/shutdown emission limits prior to control (Special Conditions Nos. 22 and 23), control which must be achieved on or before June 30, 2008.
- (6) Maintenance/start-up/shutdown emission limits (Special Conditions Nos. 22 and 23) after control.

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

Hrs/day___ Days/week___ Weeks/year___ or Hrs/year 8,760

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

Dated

Compliance History

Customer/Respondent/Owner-Operator:	CN600632848 Huntsman Petrochemical Corporation	Classification: AVERAGE	Rating: 6.83
Regulated Entity:	RN100219252 HUNTSMAN PORT NECHES	Classification: AVERAGE	Site Rating: 40.52

ID Number(s):	ACCOUNT NUMBER	JE0052V
AIR OPERATING PERMITS	PERMIT	1320
AIR OPERATING PERMITS	PERMIT	2286
AIR OPERATING PERMITS	PERMIT	2287
AIR OPERATING PERMITS	PERMIT	2288
AIR OPERATING PERMITS	PERMIT	1322
AIR OPERATING PERMITS	PERMIT	1327
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD008076846
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR) REGISTRATION	30029
PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	35486
PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	40711
AIR NEW SOURCE PERMITS	AFS NUM	4824500006
AIR NEW SOURCE PERMITS	PERMIT	29516
AIR NEW SOURCE PERMITS	REGISTRATION	71975
AIR NEW SOURCE PERMITS	REGISTRATION	71986
AIR NEW SOURCE PERMITS	PERMIT	51889
AIR NEW SOURCE PERMITS	PERMIT	51736
AIR NEW SOURCE PERMITS	PERMIT	52715
AIR NEW SOURCE PERMITS	PERMIT	54551
AIR NEW SOURCE PERMITS	PERMIT	54550
AIR NEW SOURCE PERMITS	PERMIT	53515
AIR NEW SOURCE PERMITS	PERMIT	54565
AIR NEW SOURCE PERMITS	PERMIT	44055
AIR NEW SOURCE PERMITS	PERMIT	44123
AIR NEW SOURCE PERMITS	PERMIT	44124
AIR NEW SOURCE PERMITS	PERMIT	44125
AIR NEW SOURCE PERMITS	PERMIT	44164
AIR NEW SOURCE PERMITS	PERMIT	44165
AIR NEW SOURCE PERMITS	PERMIT	44034
AIR NEW SOURCE PERMITS	PERMIT	44295
AIR NEW SOURCE PERMITS	PERMIT	44434
AIR NEW SOURCE PERMITS	PERMIT	44454
AIR NEW SOURCE PERMITS	PERMIT	44555
AIR NEW SOURCE PERMITS	PERMIT	44556
AIR NEW SOURCE PERMITS	PERMIT	44561
AIR NEW SOURCE PERMITS	PERMIT	44694
AIR NEW SOURCE PERMITS	PERMIT	44812
AIR NEW SOURCE PERMITS	PERMIT	45089
AIR NEW SOURCE PERMITS	PERMIT	45090
AIR NEW SOURCE PERMITS	PERMIT	45094
AIR NEW SOURCE PERMITS	PERMIT	45198
AIR NEW SOURCE PERMITS	PERMIT	45277
AIR NEW SOURCE PERMITS	PERMIT	45278
AIR NEW SOURCE PERMITS	PERMIT	45644
AIR NEW SOURCE PERMITS	PERMIT	45569
AIR NEW SOURCE PERMITS	PERMIT	45664
AIR NEW SOURCE PERMITS	PERMIT	45663
AIR NEW SOURCE PERMITS	PERMIT	46059
AIR NEW SOURCE PERMITS	PERMIT	46088
AIR NEW SOURCE PERMITS	PERMIT	42324
AIR NEW SOURCE PERMITS	PERMIT	46489
AIR NEW SOURCE PERMITS	PERMIT	46604
AIR NEW SOURCE PERMITS	PERMIT	46791
AIR NEW SOURCE PERMITS	PERMIT	47011
AIR NEW SOURCE PERMITS	PERMIT	47039
AIR NEW SOURCE PERMITS	PERMIT	47065

AIR NEW SOURCE PERMITS	PERMIT	47422
AIR NEW SOURCE PERMITS	PERMIT	47555
AIR NEW SOURCE PERMITS	PERMIT	47513
AIR NEW SOURCE PERMITS	PERMIT	47577
AIR NEW SOURCE PERMITS	PERMIT	47887
AIR NEW SOURCE PERMITS	PERMIT	48001
AIR NEW SOURCE PERMITS	PERMIT	48178
AIR NEW SOURCE PERMITS	PERMIT	48176
AIR NEW SOURCE PERMITS	PERMIT	47939
AIR NEW SOURCE PERMITS	PERMIT	49247
AIR NEW SOURCE PERMITS	PERMIT	49429
AIR NEW SOURCE PERMITS	PERMIT	49295
AIR NEW SOURCE PERMITS	PERMIT	49493
AIR NEW SOURCE PERMITS	PERMIT	49615
AIR NEW SOURCE PERMITS	PERMIT	50109
AIR NEW SOURCE PERMITS	PERMIT	50328
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	JE0052V
AIR NEW SOURCE PERMITS	PERMIT	647B
AIR NEW SOURCE PERMITS	PERMIT	4508A
AIR NEW SOURCE PERMITS	PERMIT	5807A
AIR NEW SOURCE PERMITS	PERMIT	5952A
AIR NEW SOURCE PERMITS	PERMIT	5972A
AIR NEW SOURCE PERMITS	PERMIT	7761
AIR NEW SOURCE PERMITS	PERMIT	11824
AIR NEW SOURCE PERMITS	PERMIT	12276
AIR NEW SOURCE PERMITS	PERMIT	12800
AIR NEW SOURCE PERMITS	PERMIT	12599
AIR NEW SOURCE PERMITS	PERMIT	12951
AIR NEW SOURCE PERMITS	PERMIT	13091
AIR NEW SOURCE PERMITS	PERMIT	13377
AIR NEW SOURCE PERMITS	PERMIT	16909
AIR NEW SOURCE PERMITS	PERMIT	19823
AIR NEW SOURCE PERMITS	PERMIT	20134
AIR NEW SOURCE PERMITS	PERMIT	20160
AIR NEW SOURCE PERMITS	PERMIT	20485
AIR NEW SOURCE PERMITS	PERMIT	23141
AIR NEW SOURCE PERMITS	PERMIT	23568
AIR NEW SOURCE PERMITS	PERMIT	31443
AIR NEW SOURCE PERMITS	PERMIT	32823
AIR NEW SOURCE PERMITS	PERMIT	33285
AIR NEW SOURCE PERMITS	PERMIT	36646
AIR NEW SOURCE PERMITS	PERMIT	36453
AIR NEW SOURCE PERMITS	PERMIT	36831
AIR NEW SOURCE PERMITS	PERMIT	39725
AIR NEW SOURCE PERMITS	PERMIT	40103
AIR NEW SOURCE PERMITS	PERMIT	40375
AIR NEW SOURCE PERMITS	PERMIT	40374
AIR NEW SOURCE PERMITS	PERMIT	40527
AIR NEW SOURCE PERMITS	PERMIT	40804
AIR NEW SOURCE PERMITS	PERMIT	41444
AIR NEW SOURCE PERMITS	PERMIT	41301
AIR NEW SOURCE PERMITS	PERMIT	41757
AIR NEW SOURCE PERMITS	PERMIT	42103
AIR NEW SOURCE PERMITS	PERMIT	42153
AIR NEW SOURCE PERMITS	PERMIT	42348
AIR NEW SOURCE PERMITS	PERMIT	42526
AIR NEW SOURCE PERMITS	PERMIT	42154
AIR NEW SOURCE PERMITS	PERMIT	42458
AIR NEW SOURCE PERMITS	PERMIT	42720
AIR NEW SOURCE PERMITS	PERMIT	43143
AIR NEW SOURCE PERMITS	PERMIT	55077
AIR NEW SOURCE PERMITS	REGISTRATION	55261
AIR NEW SOURCE PERMITS	PERMIT	53808
AIR NEW SOURCE PERMITS	REGISTRATION	75754
AIR NEW SOURCE PERMITS	REGISTRATION	75597

AIR NEW SOURCE PERMITS	REGISTRATION	76383
AIR NEW SOURCE PERMITS	PERMIT	83816
AIR NEW SOURCE PERMITS	PERMIT	54935
AIR NEW SOURCE PERMITS	REGISTRATION	55753
AIR NEW SOURCE PERMITS	REGISTRATION	70023
AIR NEW SOURCE PERMITS	REGISTRATION	70024
AIR NEW SOURCE PERMITS	REGISTRATION	56738
AIR NEW SOURCE PERMITS	REGISTRATION	56737
AIR NEW SOURCE PERMITS	PERMIT	56390
AIR NEW SOURCE PERMITS	REGISTRATION	56243
AIR NEW SOURCE PERMITS	REGISTRATION	70571
AIR NEW SOURCE PERMITS	REGISTRATION	70781
AIR NEW SOURCE PERMITS	REGISTRATION	70858
AIR NEW SOURCE PERMITS	REGISTRATION	71038
AIR NEW SOURCE PERMITS	REGISTRATION	71506
AIR NEW SOURCE PERMITS	REGISTRATION	71126
AIR NEW SOURCE PERMITS	REGISTRATION	71130
AIR NEW SOURCE PERMITS	REGISTRATION	70726
AIR NEW SOURCE PERMITS	PERMIT	53551
AIR NEW SOURCE PERMITS	PERMIT	54057
AIR NEW SOURCE PERMITS	PERMIT	52313
AIR NEW SOURCE PERMITS	PERMIT	52318
AIR NEW SOURCE PERMITS	PERMIT	56077
AIR NEW SOURCE PERMITS	PERMIT	56073
AIR NEW SOURCE PERMITS	REGISTRATION	72336
AIR NEW SOURCE PERMITS	PERMIT	54328
AIR NEW SOURCE PERMITS	PERMIT	70011
AIR NEW SOURCE PERMITS	PERMIT	52583
AIR NEW SOURCE PERMITS	PERMIT	54219
AIR NEW SOURCE PERMITS	PERMIT	53979
AIR NEW SOURCE PERMITS	REGISTRATION	72310
AIR NEW SOURCE PERMITS	PERMIT	52531
AIR NEW SOURCE PERMITS	PERMIT	54231
AIR NEW SOURCE PERMITS	PERMIT	54570
AIR NEW SOURCE PERMITS	PERMIT	54234
AIR NEW SOURCE PERMITS	PERMIT	53005
AIR NEW SOURCE PERMITS	REGISTRATION	72329
AIR NEW SOURCE PERMITS	REGISTRATION	71751
AIR NEW SOURCE PERMITS	REGISTRATION	73102
AIR NEW SOURCE PERMITS	REGISTRATION	72802
AIR NEW SOURCE PERMITS	PERMIT	52077
AIR NEW SOURCE PERMITS	PERMIT	54881
AIR NEW SOURCE PERMITS	PERMIT	50360
AIR NEW SOURCE PERMITS	REGISTRATION	73927
AIR NEW SOURCE PERMITS	REGISTRATION	73665
AIR NEW SOURCE PERMITS	REGISTRATION	73663
AIR NEW SOURCE PERMITS	PERMIT	72907
AIR NEW SOURCE PERMITS	REGISTRATION	73601
AIR NEW SOURCE PERMITS	REGISTRATION	73956
AIR NEW SOURCE PERMITS	PERMIT	74236
AIR NEW SOURCE PERMITS	REGISTRATION	74511
AIR NEW SOURCE PERMITS	REGISTRATION	74362
AIR NEW SOURCE PERMITS	REGISTRATION	74296
AIR NEW SOURCE PERMITS	REGISTRATION	74096
AIR NEW SOURCE PERMITS	REGISTRATION	74838
AIR NEW SOURCE PERMITS	REGISTRATION	75203
AIR NEW SOURCE PERMITS	REGISTRATION	75183
AIR NEW SOURCE PERMITS	REGISTRATION	75202
AIR NEW SOURCE PERMITS	REGISTRATION	74849
AIR NEW SOURCE PERMITS	REGISTRATION	74851
AIR NEW SOURCE PERMITS	REGISTRATION	75064
AIR NEW SOURCE PERMITS	REGISTRATION	76932
AIR NEW SOURCE PERMITS	REGISTRATION	76510
AIR NEW SOURCE PERMITS	REGISTRATION	76627
AIR NEW SOURCE PERMITS	REGISTRATION	76732
AIR NEW SOURCE PERMITS	REGISTRATION	76950
AIR NEW SOURCE PERMITS	REGISTRATION	77129

AIR NEW SOURCE PERMITS	REGISTRATION	77217
AIR NEW SOURCE PERMITS	REGISTRATION	77327
AIR NEW SOURCE PERMITS	REGISTRATION	78199
AIR NEW SOURCE PERMITS	REGISTRATION	79036
AIR NEW SOURCE PERMITS	REGISTRATION	79296
AIR NEW SOURCE PERMITS	REGISTRATION	78974
AIR NEW SOURCE PERMITS	REGISTRATION	79198
AIR NEW SOURCE PERMITS	REGISTRATION	79800
AIR NEW SOURCE PERMITS	REGISTRATION	79529
AIR NEW SOURCE PERMITS	REGISTRATION	80149
AIR NEW SOURCE PERMITS	REGISTRATION	80390
AIR NEW SOURCE PERMITS	REGISTRATION	80171
AIR NEW SOURCE PERMITS	REGISTRATION	80169
AIR NEW SOURCE PERMITS	REGISTRATION	80328
AIR NEW SOURCE PERMITS	REGISTRATION	79939
AIR NEW SOURCE PERMITS	REGISTRATION	80702
AIR NEW SOURCE PERMITS	REGISTRATION	81531
AIR NEW SOURCE PERMITS	REGISTRATION	81415
AIR NEW SOURCE PERMITS	REGISTRATION	83113
AIR NEW SOURCE PERMITS	REGISTRATION	84374
AIR NEW SOURCE PERMITS	REGISTRATION	84617
AIR NEW SOURCE PERMITS	REGISTRATION	82543
AIR NEW SOURCE PERMITS	PERMIT	82488
AIR NEW SOURCE PERMITS	REGISTRATION	84694
AIR NEW SOURCE PERMITS	REGISTRATION	82922
AIR NEW SOURCE PERMITS	REGISTRATION	84519
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50055
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30029
STORMWATER	PERMIT	TXR15EV47

Location: 6001 HIGHWAY 366, PORT NECHES, TX, 77651 Rating Date: 9/1/2007 Repeat Violator: NO

TCEQ Region: REGION 10 - BEAUMONT

Date Compliance History Prepared: April 28, 2008

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: September 01, 2002 to August 31, 2007

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

Name: Phone:

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

Components (Multimedia) for the Site :

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

Effective Date: 03/07/2003 ADMINORDER 2002-0511-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: GC8 PERMIT

SC1 PERMIT

Description: Failure to maintain volatile organic compounds below the MAERT limit.

Classification: Moderate

5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: SC10 PERMIT
Description: Failure to properly repair leaking components by the end of the next process unit shutdown.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-9(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to properly repair leaking components by the end of the next process unit shutdown.
Effective Date: 04/25/2003 ADMINORDER 2002-1026-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: SC11 PERMIT
Description: Failure to perform daily monitoring of the Volatile Organic Compound concentration.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: SC11 PERMIT
Description: Failure to sample the outlet cooling tower water stream from the exchangers in butadiene service within 24 hours after a VOC concentration of greater than 0.5 ppmw is detected between the inlet and outlet streams.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085
Rqmt Prov: SC24 PERMIT
Description: Failure to collect grab samples within 24 hours from each suspect condenser and cooler after detecting a VOC concentration in exceedance of 0.5 ppmw, indicated by gas chromatography.
Effective Date: 06/12/2003 ADMINORDER 1998-1481-MLM-E
Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
Rqmt Prov: OR 1 PERMIT
Description: Failed to ensure that the stormwater system and all its systems of collection, treatment and disposal were properly operated and maintained by allowing oil to collect in and near the banks of the unlined PV-9 Pond near the G-6 and F-6 Units.
Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter A 335.6(a)
30 TAC Chapter 335, SubChapter A 335.6(b)
Description: Failed to notify or appropriately change the Notice of Registration for three waste streams.
Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter C 335.62
40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11
Description: Failed to make accurate hazardous waste determinations and classify any nonhazardous waste of the waste stored in and on the banks of the PV-9 Pond.
Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(2)
30 TAC Chapter 335, SubChapter C 335.69(a)(3)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(3)
Description: Failed to have the hazardous waste label visible for a 40 cubic yard roll-off box, which was covered by a tarp, failed to label a different 40 cubic yard roll-off box containing sludge with the words "hazardous waste" or the date of accumulation.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to submit complete upset reports on September 9, 10, 11, 18, 20, 23, 25 and 28, 1997.
Classification: Moderate
Citation: 30 TAC Chapter 113, SubChapter C 113.100
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.8(e)(3)(i)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to produce a copy of the startup, shutdown, and malfunction plan upon request.
Classification: Moderate
Citation: 30 TAC Chapter 113, SubChapter C 113.130

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to repair leaking components in the C-4, PO/MTBE and F-6 Units within fifteen calendar days after each leak was detected.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 1 PERMIT

Description: Failed to repair leaking components in the A-3 Unit within fifteen calendar days after leaks were detected.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)
30 TAC Chapter 116, SubChapter B 116.115(a)
5C THC Chapter 382, SubChapter A 382.085

Rqmt Prov: SC1 PERMIT

Description: Failed to repair a leaking component at the C-4 Unit within 15 calendar days after leaks were detected.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(1)(i)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to monitor components in the C-4, F-2, F-4, F-6 Units for leaks on a monthly basis.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to monitor components in the F-2, F4 and F-6 Units monthly to detect leaks, and where a leak was detected, failed to monitor the components monthly until a leak was not detected for two successive months.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to monitor components in the C-4 Unit on a quarterly basis.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Held material containing butadiene from two solvent recovery towers in an open sump, which was not capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-5(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SP 2 PERMIT

Description: Failed to equip the sample station for Tank 43 in the Receiving and Shipping areas with a closed-purge or closed vent system.

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.262
30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to timely notify the TCEQ within ten days following installation or modification of Huntsman's switching tanks 45 and 46 in the C-4 Unit to oil-water separator service.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: sc12 PERMIT

Description: Failed to include the duration or expected duration and corrective actions taken or being taken in the upset report submitted on November 7, 1998.

30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to cap or plug a temporary aromatic distillate unloading line near the west end of the bullet tanks in the Shipping and Receiving Area and failed to equip Tanks 43, 87 and 88 in benzene service, with closed-purge or closed vent systems.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(d)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 10 PERMIT
SC 11I PERMIT
SC 2A PERMIT

Description: Failure to route vapors from the degassing and/or cleaning of VOCs from transport vessels at the tank-car cleaning rack to a control device until a turnover or at least four vapor volumes.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 11I PERMIT

Description: Failed to repair leaking components in the Receiving and Shipping Area within 15 calendar days after leaks were detected.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 11I PERMIT

Description: Failed to repair a leaking component in the C-4 Unit within fifteen calendar days after leaks were detected.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to monitor one pump in the F2 Unit for leaks on a monthly basis from February 3, 1997 to October 31, 1998.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 115, SubChapter D 115.354(2)(C)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to monitor components in the F2 and F6 units monthly to detect leaks and where a leak was detected, failed to monitor components monthly until a leak was not detected for two successive months.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 6 PERMIT

Description: Exceeding the filling rate of ethylene oxide to Tank Nos. 9, 10, 30 and 180 in the Receiving and Shipping Area on May 9, May 16, May 26, 1998.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(2)
30 TAC Chapter 335, SubChapter C 335.69(a)(3)
30 TAC Chapter 335, SubChapter C 335.69(d)(2)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(2)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(3)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173(a)

Description: Failed to properly label hazardous waste containers.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(f)(2)

Description: Failed to complete weekly hazardous waste inspections of a 90-day container storage area for the weeks of 01/02/98, 02/27/98, 7/2/98, 8/7/98, 8/14/98 and 8/28/98.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(d)(1)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(I)

Description: Failed to close a hazardous waste container in the MTBE lab satellite waste accumulation area.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
40 CFR Part 60, Subpart VV 60.482-6
5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to equip an open-ended line containing VOCs with a second valve, blind flange, plug or cap.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC6C PERMIT

Description: Failed to limit visible emissions from the high pressure flare at the A-3 Unit to five minutes in a two-hour period on January 10, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: GC7 PERMIT

Description: Failed to supply records sufficient to demonstrate compliance with the permit's maximum allowable emission rate.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
5C THC Chapter 382, SubChapter A 382.0518(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to obtain permit authorization for modifications to the North Flare and the South Flare.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SP 2(A) PERMIT

Description: Failed to ensure that valve numbers 10422 and 15538 at the C-4 Unit were equipped with a second valve, blind flange, plug or cap.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
5C THC Chapter 382, SubChapter A 382.0518(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to obtain permit authorization or to satisfy the conditions of a permit by rule prior to expanding and operating the Joint Waste Water Treatment Plant.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.7(a)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.11(d)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 2A PERMIT

Description: Failed to maintain pollution emission capture equipment in good working order. Allowed Compressors 2CIA, 2CIB, and 2CIC to operate improperly.

Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

Description: Failed to have a weatherproof and readily visible identification marked with the equipment identification number attached to leaking component 29106 at the F-6 Unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 12 PERMIT

Description: Failed to maintain the stack temperature at or above 1000 degrees Fahrenheit at the Ethylene Oxide incinerator at the F6 Unit on 8/21/99.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter F 115.546(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to record the chemical name and estimated liquid quantity of VOC's contained in each vessel prior to degassing and/or cleaning.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the TCEQ within 24 hrs after discovering a reportable upset. Failed to report an upset at the C-4 Unit that occurred January 7-8, 2000 until January 13, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC1 PERMIT

Description: Allowed the release of 1,3-butadiene emissions to the atmosphere without authorization on January 7-8, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the TCEQ within 24 hrs after discovering a reportable upset that occurred at the E-4 Unit on March 12, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC1 PERMIT

Description: Allowed the release of ammonia emissions to the atmosphere without authorization on March 12, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the TCEQ within 24 hrs after discovering a reportable upset at the C-4 Unit that began on 1/10/00.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC1 PERMIT

Description: Allowed the release of 1,3-butadiene and VOC emissions to the atmosphere without authorization on January 10-11, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.7(b)(1)(D)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report the duration of a maintenance event which occurred when the A-3 Unit was shut down on January 17, 2000. The shut down report submitted January 13, 2000 failed to include the estimated duration of the event.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 1 PERMIT

Description: Allowed the release of 1,3-butadiene and VOC emissions to the atmosphere from the A-3 Unit without authorization on January 17, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)

Rqmt Prov: OR 1 PERMIT

Description: Failed to ensure that the stormwater and all its systems of collection, treatment, and disposal were properly operated and maintained by allowing oil to collect in and near the banks of the

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(b)

Description: Failed to notify the TCEQ of the locations of approximately 20 storage points for containers of nonhazardous waste oil throughout the Plant.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
30 TAC Chapter 335, SubChapter E 335.112(a)(8)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174

Description: Failed to perform weekly inspections on a railcar containing Polyblend.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC1 PERMIT

Description: Released approximately 1382 pounds of unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC1 PERMIT
SC6c PERMIT

Description: Failed to limit visible emissions from a process gas flare to five minutes in any two-hour period from Flare 1 and Flare 2 at the Cracked Gas Compressor Unit on April 21, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 1 PERMIT

Description: Exceeded the maximum allowable emission rate of 1.98 pounds per hour.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit to the TCEQ initial and final upset reports that included the duration or estimated duration of the upset for a reportable upset at the MTBE section of the Propylene Oxide/MTBE F5 Unit Ground Flare that began on 11/6/00.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC10 PERMIT

Description: Failed to limit emissions from the Propylene Oxide/MTBE F5 Unit Ground Flare to five minutes in a two-hour period on 11/7/00.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification to the TCEQ within 24 hours of discovery of a reportable upset on November 15, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 10 PERMIT

Description: Failed to limit visible emissions from the Propylene Oxide/MTBE F5 Unit Ground Flare to five minutes in a two-hour period on 11/14/00.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification to the TCEQ within 24 hrs of discovery of a reportable upset caused by a 1,3-butadiene leak from the S4E53 Exchanger at Cooling Tower 3 at the C4 Unit that began on 11/5/00.

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report to the TCEQ the start time of a reportable upset concerning an ammonia leak at the E4 Unit in the Oxides and Olefins Plant which began on 11/13/00.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Not specified PERMIT

Description: Exceeded the maximum allowable emission rate for ammonia.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification to the TCEQ within 24 hrs of discovery of a reportable upset that began on 11/15/00 at a pump in the E7 Unit at the Oxides and Olefins Plant.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Not specified PERMIT

Description: Exceed the maximum allowable emission rate for Permit No. 647B by allowing 1860 pounds of ammonia from a ruptured pump gasket to release to the atmosphere during an upset that began on 11/15/00.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to include the estimated duration of a reportable upset in an upset notification concerning a benzene leak from Cooling Tower No. 4 at the A3 Unit in the Oxides and Olefins Plant that began on 11/6/00.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC1 PERMIT

Description: Exceeded the maximum allowable emission rate of 1.58 pounds per hour of benzene emissions from Cooling Tower No. 4 at the A3 Unit in the Oxides and Olefins Plant w/o authorization.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification to the TCEQ within twenty-four hours of discovery of a reportable upset at the F-4 incinerator at the F4 Unit in the Oxides and the Olefins Plant that began on November 13, 2000.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Not specified PERMIT

Description: Exceeded the maximum allowable emission rate of 2.15 pounds per hour for VOC emissions in Permit No. 5927A during an upset that began on 11/13/00.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to include in the upset notification to the TCEQ the estimated duration of reportable upsets at the A3 Olefins Unit, Propylene Oxide/MTBE Plant, and the F2 Unit that began on 12/16/00.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Not specified PERMIT

Description: Exceeded permitted limits.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification to the TCEQ within 24 hrs of discovery of a reportable upset at the C-A3-1/Flares at the A3 Unit in the Oxides and Olefins Plant which began on January 7, 2001.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: Not specified PERMIT
Description: Exceeded the maximum allowable emission rates for VOC and NOx emission in TCEQ Permit No. 19823.
Effective Date: 06/12/2003 ADMINORDER 2001-0349-AIR-E
Classification: Moderate
Citation: 5C THC Chapter 382, SubChapter A 382.085(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Caused or contributed to elevated off-site concentrations of 1,3-butadiene, methyl tertiary butyl ether, styrene, and other volatile organic compounds on August 26, thru Aug 30, 2000.
Effective Date: 06/13/2004 ADMINORDER 2003-0650-AIR-E
Classification: Moderate
Citation: 5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to prevent the emission of an air contaminant that will contribute to air pollution.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 Special Conditions No. 5 PERMIT
Description: Failure to maintain an emission rate below an allowable emission limit at the Butadiene Unit.
Effective Date: 08/20/2006 ADMINORDER 2006-0107-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: Permit 5952A SC 1 PA
Description: Failure to maintain an emission rate below the allowable emissions limit.
Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to properly notify the Beaumont Region Office of a reportable emissions event for Incident 69694.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 19823, SPECIAL CONDITION 1 PERMIT
Description: Failure to prevent ethylene emissions during Incident 69694.
Effective Date: 09/21/2006 ADMINORDER 2006-0399-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: No. 16909 PERMIT
Description: Failure to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 PERMIT
O-01327 OP
Description: Failure to meet the minimum net heating value requirement during the compliance test conducted on June 8, 2005, which should be greater than 11.2MJ/scm. Results of the compliance test show a minimum net heating value of 10.23MJ/scm.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: Permit 5952A, SC 1 PERMIT
Description: Failure to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to report an emissions event within 24 hours after discovery.
Classification: Moderate

Description: Failure to prevent unauthorized emissions.
Effective Date: 12/02/2006 ADMINORDER 2005-0926-AIR-E
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 PERMIT
Description: Failure to maintain VOC limit less than 2.0 ppmw in C4 Cooling Tower.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 PERMIT
Description: Failure to maintain an emission rate below the allowable limit.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: 647B/MAERT PERMIT
Description: Failure to prevent unauthorized ammonia emissions from the E7 Cooling Tower. A8c2Aii
Classification: Moderate
Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.730
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT PPP 63.1435(a)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failure to conduct HON sampling and analysis following an approved method.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20160 PERMIT
Description: Failure to repair leaking exchanger in the PO/MTBE cooling water system during unit shutdown.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)
Description: Failed to notify the TCEQ within 24 hours after the discovery of a reportable emissions event at 1:00 p.m. on September 16, 2003 at the MTBE Drying Column Overhead Line.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: 20160/General Condition 8 PERMIT
Description: Failed to prevent unauthorized emissions of 479.5 lbs of Dimethyl Ether, 8631.6 lbs of Isobutylene and 479.5 lbs of Methyl Formate from the MTBE Drying Column Overhead Line on September 16, 2003.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: 1322/SC17 OP
20160/GC 8 PERMIT
Description: Failed to prevent unauthorized emissions of 15 lbs of Ethylene Glycol, 699 lbs of Tert Butanol and 854 lbs of Tert Butyl Hydroperoxide from the Tertiary Butyl Alcohol (TBHP) Feed Header on January 11, 2004.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20160, GC8 PERMIT
O-01322, SC17 OP
Description: Failed to prevent unauthorized emissions of 745 lbs of Tert Butanol from Tank 007, the TBA Dav Tank (EPN POTK007) on February 23, 2004.

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1322/SC 17 OP
5972A/SC 1 PERMIT

Description: Failed to prevent unauthorized emissions of 67 lbs of ethylene oxide from the F-P-137 Ethylene Oxide Rundown on August 25, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 5952A, SC1 PERMIT

Description: Failed to prevent unauthorized emissions of VOCs of 303 lbs on December 10, 2003, 98 lbs December 13, 2003, 432 lbs January 1, 2004, 394 lbs January 15, 2004, 547 lbs February 17, 2004, and 167 lbs on February 28, 2004 from the F-F-6 Regenerator Vent.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 5952/ SC 1 PERMIT

Description: Failed to prevent unauthorized emissions of 595 lbs of Ethylene and 44 lbs of Ethylene Glycol from the Regenerator Flash Drum Vent on November 22, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the TCEQ within 24 hours after the discovery of a reportable emissions event on August 23, 2003 at the F-4 Regenerator (EPN F4FF135).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 19823, SC1 PERMIT

20160, GC8 PERMIT

5972A, SC1 PERMIT

O-01322, SC17 OP

Description: Failed to prevent unauthorized emissions on August 23, 2003 of 1) 5304 lbs of VOC from the PO/MTBE Unit, and 2073 lbs of CO and 251 lbs of NOx from the F5 Unit of the PO/MTBE Plant to the PO/MTBE Flare (EPN POFLARE), and 2) 221 lbs of Ethylene from the Regen/Reabsorb Vent at the F4 Regenerator (EPN F4FF135).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a final record to the TCEQ within two weeks after the end of a reportable emissions event on September 6, 2003 at the F-6 Regenerator Vent (EPN F6FF6104).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 5952A, SC1 PERMIT

Description: Failed to prevent unauthorized emissions of 106 lbs of Ethylene from the F-6 Regenerator Vent (EPN F6FF6104) on September 6, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the TCEQ within 24 hours after the discovery of a reportable emissions event at 8:15 p.m. on October 5, 2003 at the F-6 Regenerator Vent (EPN F6FF6104).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

Rqmt Prov: 5952A, SC1 PERMIT

Description: Failed to prevent unauthorized emissions of 146 lbs VOCs (Ethylene and Ethylene Glycol) from the F-6 Regenerator Vent (EPN F6FF6104) on October 5, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the TCEQ within 24 hours after the discovery of a reportable emissions event at 12:15 p.m. on October 25, 2003 at the relief valve on the ammonia absorber (EPN E4FUG1) at the E4 Unit of the Olefins and Oxides (O&O) Plant.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1322/ SC 15 OP
5897A/ SC1 PERMIT

Description: Failed to prevent unauthorized emissions of 2514 lbs of Ammonia from the relief valve on the ammonia absorber (EPN E4FUG1) at the E4 Unit of the O&O Plant on October 25, 2003.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20485, SC1 PERMIT
O-01327, SC15 OP

Description: Failed to prevent unauthorized emissions on January 15, 2004 of 12 lbs of VOCs and 18 lbs of 1,3-Butadiene from the North Unit of the C4/MTBE/Butadiene Units, and 3 lbs of NOx and 19 lbs of CO from the Butadiene Unit of the C4 Plant to the North/South Flare (EPN UWNR1, UW6R1).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1327/ SC15 OP
20485/ SC1 PERMIT

Description: Failed to prevent unauthorized emissions of 163.46 lbs of VOCs on August 20, 2003 and 302.658 lbs of VOCs on February 20, 2004 from the tank hatch of Tank 77.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20485, SC1 PERMIT
O-01327, SC15 OP

Description: Failed to prevent unauthorized emissions to the North/South Flare (EPN UWN6R1/UWS6R1) of 2) 48 lbs of VOC and 17 lbs of 1,3 Butadiene from the MTBE Unit on July 22, 2003, and 3) 173 lbs of VOC, 79 lbs of 1,3 Butadiene, 131 lbs of CO and 13 lbs of NOx from the C4 Plant on February 7, 2004.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to report an emissions event within 24 hours of discovery.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to report an emissions event within 24 hours of discovery.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 5807A SC 1 PERMIT

Description: Failure to comply with an emissions limitation.

Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 5952A SC1 PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 5952A SC1 PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 29516 General Conditions PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 56390 SC1 PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 SC 1 PERMIT
20485/ Attachment A PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 SC 1 PERMIT
20485/ Attachment A PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 SC 1 PERMIT
20485/ Attachment A PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 SC 1 PERMIT
20485/ Attachment A PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 20485 SC1 PERMIT
20485/ Attachment A PERMIT
Description: Failure to comply with an emissions limitation.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)

Description: Failure to comply with an emissions limitation.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to comply with permit representations of 99.5% VOC destruction efficiency for Flare 3. A8c1G

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 19823 PERMIT

Description: Failure to prevent visible emissions from the High Pressure Flare - South. B14

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to maintain air pollution emission capture and abatement equipment in good working order and operating properly for Flare 3. B18

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 19823 PERMIT

Description: Failure to prevent visible emissions from the High Pressure Flare - South. B14

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to maintain air pollution emission capture and abatement equipment in good working order and operating properly for Flare 3. B18

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)
30 TAC Chapter 116, SubChapter B 116.116(b)(1)
30 TAC Chapter 116, SubChapter B 116.116(b)(1)(C)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to comply with permit representations of 99.5% VOC destruction efficiency for Flare 3. A8c1G

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
30 TAC Chapter 101, SubChapter F 101.201(b)(4)
30 TAC Chapter 101, SubChapter F 101.201(b)(8)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to comply with a reporting requirement.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
30 TAC Chapter 101, SubChapter F 101.201(b)(4)
30 TAC Chapter 101, SubChapter F 101.201(b)(8)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to comply with a reporting requirement.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
30 TAC Chapter 101, SubChapter F 101.201(b)(4)
30 TAC Chapter 101, SubChapter F 101.201(b)(8)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to comply with a reporting requirement.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 20485, Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limit..

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: 19823 Special Condition 1 PERMIT
O-02288 Special Condition 16 OP

Description: Failure to maintain an emission rate below the allowable emission limit.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(c)
30 TAC Chapter 101, SubChapter F 101.211(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to submit a timely reports of an emissions events on October 20 and 25, 2004, and March 16,2005.

Classification: Major

Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit 5807A SC 1 PERMIT

Description: Failure to prevent unauthorized emissions that occurred at the anhydrous ammonia loading area of the E4 Unit; E4 Unit covered by Permit 5807A. Incident 48357.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: FOP O-01327, SC 15 OP

Permit 20486, SC 1 PERMIT

Description: Failure to comply with the MAERT limits of permit 20485; failure to comply with the conditions of FOP O-01327.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: FOP O-01327, SC 15 OP

Permit 20485, SC 1 PERMIT

Description: Failure to comply with the emissions limits as specified in Special Condition 1, which references the Maximum Allowable Emissions Rate Table, of TCEQ Permit 20485, and Special Condition 15 of Federal Operating Permit O-01327.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to properly report emissions events.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to submit an initial notification of an emissions event with 24 hours.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Huntsman failed to properly identify the correct Emission Point Common Name in 57946 final notification.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 19823/ SC 1 PERMIT

Description: Failure to comply with the Maximum Allowable Emissions Rate Table (MAERT) of TCEQ Permit 19823.

Effective Date: 05/25/2007

ADMINORDER 2006-0902-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Tower Pressure Relief Vent, PRV 2355.

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.)

1	09/25/2002	(12184)
2	10/08/2002	(13061)
3	10/11/2002	(8025)
4	10/15/2002	(13466)
5	10/15/2002	(13326)
6	11/26/2002	(16960)
7	11/26/2002	(16488)
8	11/26/2002	(16469)
9	11/26/2002	(16872)
10	11/26/2002	(16989)
11	11/26/2002	(16833)
12	11/26/2002	(16629)
13	11/26/2002	(16869)
14	11/26/2002	(16494)
15	11/26/2002	(16603)
16	11/26/2002	(16606)
17	11/26/2002	(16524)
18	12/04/2002	(16984)
19	12/12/2002	(16651)
20	12/12/2002	(16873)
21	12/13/2002	(16639)
22	12/18/2002	(16658)
23	02/26/2003	(25453)
24	02/26/2003	(25418)
25	02/27/2003	(25223)
26	02/28/2003	(26623)
27	02/28/2003	(26561)
28	03/31/2003	(26570)
29	04/03/2003	(27484)
30	04/03/2003	(26237)
31	04/14/2003	(25395)
32	05/09/2003	(31845)
33	05/12/2003	(29308)
34	06/09/2003	(33422)
35	07/01/2003	(118989)
36	07/08/2003	(24015)
37	07/08/2003	(25046)
38	08/27/2003	(139288)
39	08/29/2003	(119121)
40	10/03/2003	(249924)
41	12/12/2003	(256877)
42	03/30/2004	(262961)
43	03/30/2004	(263046)
44	04/01/2004	(262946)
45	04/01/2004	(262873)
46	04/01/2004	(262956)
47	04/01/2004	(263014)
48	04/01/2004	(263010)
49	04/01/2004	(263588)
50	04/01/2004	(263043)
51	04/01/2004	(262968)
52	04/01/2004	(262879)
53	04/01/2004	(263022)
54	04/01/2004	(263607)
55	04/02/2004	(264437)
56	04/02/2004	(264455)
57	04/02/2004	(263644)

60	04/08/2004	(263004)
61	04/21/2004	(264467)
62	04/21/2004	(264098)
63	04/21/2004	(264471)
64	04/21/2004	(264092)
65	06/23/2004	(273321)
66	07/16/2004	(270119)
67	08/26/2004	(273402)
68	08/31/2004	(263533)
69	08/31/2004	(285082)
70	09/08/2004	(288721)
71	10/18/2004	(333854)
72	01/11/2005	(343813)
73	01/28/2005	(343967)
74	02/16/2005	(344499)
75	02/16/2005	(344565)
76	02/16/2005	(351061)
77	02/23/2005	(346660)
78	03/08/2005	(346632)
79	03/08/2005	(347207)
80	03/10/2005	(341723)
81	03/31/2005	(373656)
82	04/04/2005	(349319)
83	04/04/2005	(349315)
84	04/05/2005	(349320)
85	04/05/2005	(349133)
86	04/05/2005	(374774)
87	04/15/2005	(375442)
88	04/15/2005	(375452)
89	04/15/2005	(375457)
90	04/21/2005	(373550)
91	04/26/2005	(374614)
92	05/12/2005	(378265)
93	05/12/2005	(378267)
94	05/12/2005	(377634)
95	05/12/2005	(377613)
96	05/12/2005	(377543)
97	05/12/2005	(378487)
98	05/12/2005	(378225)
99	05/18/2005	(377798)
100	05/20/2005	(376583)
101	05/20/2005	(377225)
102	06/14/2005	(379665)
103	06/15/2005	(379607)
104	06/15/2005	(394963)
105	06/17/2005	(380357)
106	07/05/2005	(395675)
107	07/05/2005	(395572)
108	07/06/2005	(397867)
109	07/15/2005	(392774)
110	07/15/2005	(392639)
111	08/02/2005	(401638)
112	08/25/2005	(403293)
113	08/29/2005	(399102)
114	08/31/2005	(381075)
115	09/09/2005	(404606)
116	11/03/2005	(419194)
117	11/16/2005	(434314)
118	12/05/2005	(398736)
119	12/05/2005	(431206)
120	12/06/2005	(437343)
121	12/06/2005	(437334)
122	12/06/2005	(437338)
123	12/16/2005	(437133)
124	01/27/2006	(437989)

128	02/22/2006	(456022)
129	02/22/2006	(456036)
130	02/22/2006	(455947)
131	02/22/2006	(455838)
132	02/22/2006	(456099)
133	02/27/2006	(454550)
134	02/28/2006	(457553)
135	02/28/2006	(457561)
136	02/28/2006	(457516)
137	03/30/2006	(456815)
138	03/30/2006	(458616)
139	03/30/2006	(453754)
140	03/30/2006	(458485)
141	03/30/2006	(458020)
142	03/31/2006	(458673)
143	04/07/2006	(455375)
144	04/07/2006	(454572)
145	04/07/2006	(458321)
146	04/07/2006	(459162)
147	04/26/2006	(461473)
148	05/01/2006	(463769)
149	05/04/2006	(464589)
150	05/26/2006	(465414)
151	06/22/2006	(465864)
152	07/31/2006	(487611)
153	08/17/2006	(481936)
154	08/23/2006	(485023)
155	08/31/2006	(449989)
156	08/31/2006	(486891)
157	08/31/2006	(454082)
158	08/31/2006	(487767)
159	09/11/2006	(488579)
160	09/19/2006	(513278)
161	09/20/2006	(511947)
162	09/20/2006	(511204)
163	09/25/2006	(509094)
164	09/25/2006	(497536)
165	09/25/2006	(488474)
166	10/10/2006	(513527)
167	10/25/2006	(515506)
168	10/25/2006	(515822)
169	10/25/2006	(515478)
170	10/30/2006	(511240)
171	11/08/2006	(515666)
172	11/13/2006	(517041)
173	11/13/2006	(517036)
174	11/15/2006	(517191)
175	11/15/2006	(514399)
176	11/16/2006	(515790)
177	11/27/2006	(518436)
178	11/28/2006	(517675)
179	11/28/2006	(516609)
180	11/30/2006	(516090)
181	12/04/2006	(533060)
182	12/12/2006	(533440)
183	12/15/2006	(531666)
184	12/28/2006	(488675)
185	12/29/2006	(456006)
186	01/17/2007	(531872)
187	02/08/2007	(535487)
188	02/20/2007	(535145)
189	02/21/2007	(537271)
190	02/23/2007	(540396)
191	02/23/2007	(534486)
192	02/23/2007	(537684)
193	02/26/2007	(540551)

196 03/20/2007 (539462)
 197 04/09/2007 (541905)
 198 04/20/2007 (541289)
 199 04/21/2007 (533084)
 200 04/26/2007 (537371)
 201 04/27/2007 (543604)
 202 04/30/2007 (543451)
 203 05/16/2007 (555268)
 204 05/31/2007 (543792)
 205 06/14/2007 (558239)
 206 06/14/2007 (557996)
 207 06/14/2007 (557699)
 208 06/14/2007 (561265)
 209 06/26/2007 (543284)
 210 07/12/2007 (515129)
 211 07/30/2007 (558200)

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

Date: 05/09/2003 (31845)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT 20485
 Description: Failure to maintain the Maximum Allowable Emission Rate Table (MAERT) limit of 170 pounds per hour (lb/hr) for Boilers 1 and 2 (EPN UW6BB1&2) for Carbon Monoxide (CO).

Date: 10/03/2003 (249924)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(9)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Failure to provide the basis used for determining the quantity of air contaminants emitted during an emissions event.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Failure to maintain an emission rate below an allowable emission limit.

Date: 06/23/2004 (273321)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
 30 TAC Chapter 113, SubChapter C 113.100
 30 TAC Chapter 113, SubChapter C 113.110
 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 20485, SC 2D
 PERMIT 20485, SC 3
 Description: Failure to properly operate the South Flare on May 3, 2004.

Date: 01/12/2005 (343813)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 113, SubChapter C 113.130
 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Part 63, Subpart H 63.167
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP Permit O-02286, SC 1D
 Description: Failure to maintain all VOC lines equipped with a capped end, blind flange, or double blocked valve at the T-E3-147 Tank and the Pump Out Line 56.

Date: 04/01/2005 (373656)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Failure to prevent visible emissions.

Date: 08/23/2006 (485023)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

OP O-02287
 Description: Failure to maintain the daily production limit for the E4 Unit as reported in the Deviation Report for FOP O-02287 covering January 20, 2004 to July 20, 2004.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.144(1)(F)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(f)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP O-02287
 Description: Failure to continuously collect and maintain pilot monitoring data, as required by 30 TAC 122.144(1) and 40 CFR 60.7(f), and reported in the Deviation Report for FOP O-02287 covering January 20, 2004 to July 20, 2004.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 113, SubChapter C 113.110
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(b)(3)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP O-02287
 Description: Failure to analyze quarterly cooling water samples using Method 624 as reported in the Deviation Report for FOP O-02287 covering January 20, 2004 to July 20, 2004.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: PERMIT 19823
 PERMIT 5807A
 OP O-02287
 OP O-02288
 Description: Failure to operate without a cap, blind flange, plug, or a second valve installed on equipment in VOC service for the following operating permits and Units: O-02287 - 5 components (Component Numbers 03968, 05771, 06097, 07502 and 07824) in E4FUG; O-02288 - 1 component (Component Number 0228) in A3FUG.
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: PERMIT 647B
 OP O-02287
 Description: Failure to maintain the hourly production limit for Morpholine as reported in the Deviation Report for FOP O-02287 covering July 21, 2004 to January 19, 2005.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 106, SubChapter K 106.264(7)
 30 TAC Chapter 116, SubChapter B 116.110(a)(4)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP O-02287
 Description: Failure to submit a notification within ten days following installation of the replacement facility as reported in the Deviation Report for FOP O-02287 covering July 20, 2005 to January 19, 2006.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: PERMIT 647B
 OP O-02287
 Description: Failure to operate the E7 flare with a flame present at all times as reported in the Deviation Report for FOP O-02287 covering July 20, 2005 to January 19, 2006.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 29516
OP O-02288

Description: Failure to maintain the minimum scrubber flow rate of 4,800 gallons per hour and the maximum Ethylene Oxide (EO) vapor flow to the scrubber of 1562.4 lbs/hr. as reported in the Deviation Report for FOP O-02288 covering February 14, 2005 to August 14, 2005.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.703(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.705(d)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02288

Description: Failure to conduct and maintain records of monthly inspections of by-pass seals applicable to 40 CFR Part 60, Subparts NNN/RRR/FF as reported in the Deviation Report for FOP O-02288 covering February 14, 2005 to August 14, 2005.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(B)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02288

Description: Failure to maintain the tank opening in a closed position during normal operations on Tanks T087 and T088, as reported in the Deviation Reports for FOP O-02288 covering February 14, 2005 to August 14, 2005 and August 15, 2005 to February 14, 2006.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(A)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02288

Description: Failure to submit a Form PI-7 within 10 days following the addition of fugitive components as reported in the Deviation Report for FOP O-02288 covering February 14, 2005 to August 14, 2005.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 29516
OP O-02288

Description: Failure to maintain records of the scrubber water flow rate and temperature, and vapor flow rate in lbs/hr at the inlet of the scrubber for Unit RSEF085 as reported in the Deviation Report for FOP O-02288 covering August 15, 2005 to February 14, 2006.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 19823
OP O-02288

Description: Failure to maintain records of the Waste Heat Boiler CEMS daily calibrations for Unit A3HA35 as reported in the Deviation Report for FOP O-02288 covering August 15, 2005 to February 14, 2006.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(l)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.705(l)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(6)

Description: Failure to submit one 40 CFR Part 61, Subpart FF quarterly report for Unit PROA3WW and one 40 CFR Part 60, Subparts NNN/RRR semiannual report for applicable facilities within 30 days after the end of the applicable reporting period of December 31, 2005 as reported in the Deviation Report for FOP O-02288.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 16909
PERMIT 19823
OP O-02288

Description: Failure to submit the semiannual reports within 30 days after the end of the applicable reporting period of December 31, 2005 for Units UEHK11, CG1/CG2, and A3HA35, as reported in the Deviation Report for FOP O-02288 covering August 15, 2005 to February 14, 2006.

Date: 11/13/2006 (517041)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(b)(2)

Rqmt Prov: PERMIT P.P. II.C.1.I
PERMIT P.P. II.C.2.a

Description: Failure to maintain safety and emergency equipment inspection records.

Date: 11/13/2006 (517036)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)

Description: Failure to maintain the liner in the secondary containment.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(d)

Rqmt Prov: PERMIT P.P. II.C.1.I
PERMIT P.P. II.C.2.a

Description: Failure to input the date on the daily inspection logs.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(d)

Rqmt Prov: PERMIT P.P. II.C.1.I
PERMIT P.P. II.C.2.a

Description: Failure to input the signature of the inspector on the daily inspection logs.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT B 264.15(a)

Rqmt Prov: PERMIT P.P. II.C.1.I
PERMIT P.P. II.C.2.a

Description: Failure to conduct required daily inspection of the BIF and hazardous waste tanks for malfunctions, deteriorations, operator errors, and discharges.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.221(a)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(8)(iv)

Rqmt Prov: PERMIT P.P. II.C.1.p
PERMIT P.P. II.C.2.i

Description: Failure to test for all associated alarms and parameters during the automatic waste feed cut-off monthly test as required by the permit.

Date: 01/18/2007 (531872)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 20160 SC 15E

PERMIT 20160 SC 20

OP O-01322 SC 17

Description: Failure to have cap and plugs installed on open-ended lines.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-01322 General Terms and Conditions
OP O-01322 SC 20

Description: Failure to submit the annual compliance certification for FOP O-01322 in a timely manner.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1).
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.144(1)(G)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(f)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-01322 SC 10A
OP O-01322 SC 1A

Description: Failure to maintain records of daily calibration of continuous monitors and failure to continuously monitor due to failed calibrations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report all instances of deviations?

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-01322 SC 12G
OP O-01322 SC 1A

Description: Failure to submit a required semiannual report.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.354(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(d)(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.173(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to maintain records of weekly pump and flange check.

Date: 02/26/2007 (534486)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 20485 Special Condition 26F
PERMIT 20485 Special Condition 2A
PERMIT 20485 Special Condition 3
OP O-01327 Special Condition 15

Description: Failure to operate without a cap, blind flange, plug, or a second valve installed on equipment in VOC service at the C4 Plant.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120
30 TAC Chapter 115, SubChapter B 115.136(a)(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(c)(2)(ii)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: PERMIT 20485 Special Condition 12
 PERMIT 20485 Special Condition 3
 OP O-01327 Special Condition 1A
 OP O-1327 Special Condition 15
 Description: Failure to continuously collect and maintain operational parameters of any control device required to be installed to meet applicable control requirements required by 30 TAC 115.136(a)(2).

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report all instances of deviations.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C 113.130
 30 TAC Chapter 115, SubChapter D 115.352(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(c)(2)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 20485 Special Condition 3
 OP O-01327 Special Condition 15
 Description: Failure to make the first attempt at repair within five calendar days.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 20485 Special Condition 35(B)
 PERMIT 20485 Special Condition 8(B)
 PERMIT 20485 Special Condition 8(C)
 OP O-01327 Special Condition 15
 Description: Failure to maintain emission rates below permitted limits.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.144(1)(A)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(f)(2)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(f)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 20485 Special Condition 3
 PERMIT 20485 Special Condition 2A
 OP O-01327 Special Condition 15
 Description: Failure to maintain records of flare monitors at the South Flare
 Date: 06/27/2007 (543284)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: PERMIT 19823 Special Condition 20
 OP FOP 2288 General Terms and Conditions
 OP FOP 2288 Special Condition 16
 Description: Failure to conduct stack sampling or fuel analysis for SO2 emissions as required by Permit 19823 Special Condition 20. EIC B(1) MOD 2(A)
 Date: 07/31/2007 (558200)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 113, SubChapter C 113.130
 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
 5C THC Chapter 382, SubChapter D 382.085(b)

OP 02288 Special Condition 16
 PERMIT 19823 Special Condition 18E
 PERMIT 36646 Special Condition 8E
 PERMIT 5952 Special Condition 21E
 PERMIT 5972A Special Condition 10
 PERMIT 5972A Special Condition 17E
 PERMIT 5972A Special Condition 7

Description: Failure to operate without a cap, blind flange, plug, or a second valve installed. C10 cannot be picked.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(a)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP 01320 Special Condition 13
 PERMIT 5972A Special Condition 5A

Description: Failure to monitor, record and maintain the F-4 Firebox temperature above the permitted limit.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(e)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP 01320 Special Condition 13
 PERMIT 5972A Special Condition 4

Description: Failure to maintain records of tank pressure.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP 01320 Special Condition 13
 PERMIT 5952 Special Condition 12

Description: Failure to monitor, record and maintain the F-6 Firebox temperature above the permitted limit

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to report all instances of deviations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.144(1)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP 01320 Special Condition 13
 PERMIT 36646 Special Condition 12

Description: Failure to maintain records of monthly monitoring.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
 30 TAC Chapter 122, SubChapter B 122.144
 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to maintain records of the daily flare observations.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP 02288 Special Condition 16

Description: Failure to monitor NOx, CO and O2 at CG1/UEHK9 and CG2/UEHK10.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.144(1)

Description: PERMIT 16909 Special Condition 15I
 Failure to maintain records.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 16
 PERMIT 19823 Special Condition 14A
 Description: Failure to have the cooling tower water sample port installed as required by
 permit.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.144(1)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 16
 PERMIT 16909 Special Condition 12A
 PERMIT 19823 Special Condition 21D
 Description: Failure to monitor and maintain records of daily zero and span of continuous
 monitors.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 16
 PERMIT 19823 Special Condition 10
 Description: Failure to comply with conditions of a permit.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 16
 PERMIT 16909 Special Condition 14
 Description: Failure to monitor.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 16
 PERMIT 19823 Special Condition 10C
 Description: Failure to operate the flare in a smokeless manner.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Description: Failure to report all instances of deviations.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(1)(iv)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(b)(3)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 1 E
 Description: Failure to maintain the tank opening in a closed position during normal operations
 on Tank T087.
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter D 382.085(b)
 Rqmt Prov: OP 02288 Special Condition 16
 PERMIT 49247 Special Condition 7
 Description: Failure to maintain emissions rate below the allowable limit.

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(B)
 30 TAC Chapter 122, SubChapter B 122.145(2)(C)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP General Terms and Conditions
 Description: Failure to submit a semiannual deviation report.
 Self Report? NO
 Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.146(2)
 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP 01320 Special Condition 15
 Description: Failure to submit an annual permit compliance certification (ACC) report within 30 days of the certification period.

- F. Environmental audits.
- Notice of Intent Date: 06/28/2004 (347983)
No DOV Associated
 - Notice of Intent Date: 07/22/2004 (334174)
No DOV Associated

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