

REVISIONS TO THE STATE IMPLEMENTATION PLAN (SIP)

AGREED ORDERS FOR COMPANIES IN THE
BEAUMONT-PORT ARTHUR AREA

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
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**AGREED ORDERS FOR COMPANIES IN THE
BEAUMONT-PORT ARTHUR AREA**

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CHAPTER 1: GENERAL

1.1 BACKGROUND

“The History of the Texas State Implementation Plan (SIP),” a comprehensive overview of the SIP revisions submitted to EPA by the State of Texas, is available at the following website:

<http://www.tnrcc.state.tx.us/oprd/sips/sipintro.html#History>

The current SIP revision incorporates certain voluntary emissions reductions, air monitoring improvements, and other actions which six companies in the BPA area have agreed to make. These voluntary measures are being undertaken to provide additional benefits to air quality in BPA, and represent the culmination of negotiations with certain environmental organizations and EPA. The commission is entering into Agreed Orders with each of the companies to make the voluntary measures enforceable. Some of the emissions reduced are nitrogen oxides and volatile organic compounds, also referred to as ozone precursors. However, no specific credit for any of these voluntary measures is being taken in the current revision of the BPA SIP.

1.2 PUBLIC HEARING INFORMATION

The commission held a public hearing on October 7, 2004, at the offices of the Southeast Texas Regional Planning Commission. A question and answer session was held 30 minutes prior to the hearing. In addition, written comments were accepted via mail, fax, and e-mail. The comment period closed at 5:00 p.m. on October 11, 2004.

1.3 SOCIAL AND ECONOMIC CONSIDERATIONS

The state has not performed an analysis of social and economic considerations because this BPA SIP is based on a local voluntary initiative.

1.4 FISCAL AND MANPOWER RESOURCES

The state has determined that its fiscal and manpower resources are adequate and will not be adversely affected through the implementation of this plan.

CHAPTER 2: SITE SPECIFIC SIP REVISION

2.1 OVERVIEW

The purpose of this site-specific SIP revision is to make certain voluntary emission reductions, projects, or activities undertaken by six Beaumont-Port Arthur companies at eight sites federally enforceable. The individual projects and associated emissions reductions, where applicable, are discussed below and summarized in Table 2-1.

2.2 ExxonMobil Oil Corporation, Jefferson County Account Number JE-0067-I

1. Addition of a wet gas scrubber with oxygen enrichment to its Fluid Catalytic Cracking (FCC) unit. The scrubber has already been installed and the startup process has begun. This project was originally submitted to the TCEQ as a voluntary emissions reduction permit (VERP) project, and oxygen equipment was added to the process for the purpose of throughput increase. There is no real calculable difference in the reductions with or without the oxygen enrichment.
2. Improved practices and maintenance procedures for the two ketone units to reduce fugitive emissions.
3. Installation of software program to improve data and system reliability of continuous emissions monitoring system (CEMS) and replacement of NO_x and CO emission analyzers. There are no quantifiable reductions associated with this project.
4. Shutdown of six grandfathered boilers for the cogeneration unit. The actual shutdown is enforceable through TCEQ Air Quality Permit No. 19566.
5. Continued operation of two SO₂ monitors as specified in the Agreed Order.

2.3 Huntsman Petrochemical Corporation, Jefferson County, Port Neches Plant Account Number JE-0052-V

1. Installation of software program to improve data and system reliability. There are no quantifiable reductions associated with this project.

2.4 Huntsman Petrochemical Corporation, Jefferson County, Port Arthur Plant Account Number JE-0135-Q

1. Control of benzene tanks by a thermal oxidizer system under TCEQ Air Quality Permit No. 16989.
2. Installation of software program to improve data and system reliability. There are no quantifiable reductions associated with this project.

2.5 ISP Elastomers, Jefferson County
Account Number JE-0017-A

1. Shutdown of North Plant, resulting in the elimination of fugitive ammonia emissions.

2.6 Mobil Chemical Company, Division of ExxonMobil Oil Corporation, Jefferson County
Account Number JE-0062-S

1. Shutdown of O&A (Olefins and Aromatics) plant boiler.
2. Removal of specific components from UDEX unit in O&A plant, as represented in TCEQ Air Quality Permit No. 18838.

2.7 Motiva Enterprises LLC, Jefferson County
Account Number JE-0095-D

1. Shutdown of boilers 26 and 27.
2. Shutdown of boiler 31.
3. Uncoupling of gas turbine generator 35 from boilers 34 and 35 and routing of the exhaust gas to the waste heat boiler, which will be controlled by selective catalytic reduction.
4. Will meet New Source Performance Standards (NSPS) requirements for three flares not otherwise required to comply with these standards.

2.8 Premcor Refining Group, Inc., Jefferson County
Account Number JE-0042-B

1. Replacement of existing fuel gas burners with Low-NO_x burners, and reduction of the allowable cap in TCEQ Air Quality Permit No. 6825A.
2. Installation of a sulfur degassing system at the Sulfur Recovery Unit, and reduction of the allowable cap in TCEQ Air Quality Permit No. 6825A.
3. Installation of software to improve data and system reliability in the CEMS systems for boilers and process heaters and the refinery process information system. There are no quantifiable reductions associated with this project.
4. Modifications to regenerative thermal oxidizer (RTO) for wastewater treatment unit #8742.
5. Installation of a wet gas scrubber for FCC unit #1241, and reduction of allowable cap under TCEQ Air Quality Permit No. 6825A.
6. Installation of flue gas cooler on FCC unit #1241, and removal of CO boiler from service. The company will reduce its allowable cap under TCEQ Air Quality Permit No. 6825A.

2.9 Mobil Chemical Company, Division of ExxonMobil Oil Corporation, Jefferson County Account Number JE-0064-O

1. Shutdown of the Chemical Specialties Plant sulfurized isobutylene unit authorized by TCEQ Air Quality Permit No. 3186.

Table 2-1: Summary of Estimated Emissions Reductions from Agreed Order Projects (emissions reductions in tons per year)

Company	VOC	NO_x	H₂S	SO₂	Benzene	CO	Ammonia	Particulate Matter
ExxonMobil Oil Corporation (2.2)	33	—	—	Not to exceed 9400	—	—	—	—
Huntsman (Port Neches) (2.3)	—	—	—	—	—	—	—	—
Huntsman (Port Arthur) (2.4)	—	—	—	—	2	—	—	—
ISP Elastomers (2.5)	—	—	—	—	—	—	280	—
Mobil Chemical (2.6, 2.9)	165.5	160-180	0.2	—	—	4.17	—	—
Motiva (2.7)	3.4	2030	—	65.4	—	83.8	—	12.4
Premcor (2.8)	—	169	1.6	1100	—	40	—	—
TOTAL	201.9	2359-2379	1.8	10,565.4	2	128.0	280	12.4

2.10 AGREED ORDERS

The Agreed Orders that are the subject of this site-specific SIP revision are contained in Appendices A through H.

Appendix A

ExxonMobil Oil Corporation, Jefferson County

Appendix B

Huntsman Petrochemical Corporation, Jefferson County, Port Neches Plant

Appendix C

Huntsman Petrochemical Corporation, Jefferson County, Port Arthur Plant

Appendix D

ISP Elastomers, Jefferson County

Appendix E

Mobil Chemical Company, Division of ExxonMobil Oil Corporation,
Jefferson County

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Motiva Enterprises LLC, Jefferson County

Appendix G

Premcor Refining Group, Inc., Jefferson County

Appendix H

Mobil Chemical Company, Division of ExxonMobil Oil Corporation,
Jefferson County