

Bryan W. Shaw, Ph.D., P.E., *Chairman*
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Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 24, 2015

U.S. Environmental Protection Agency
EPA Docket Center
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Attn: Docket No. EPA-HQ-OAR-2014-0738

Re: Title 40 Code of Federal Regulations (CFR) Parts 60, 61, and 63
Receipt of Approval Requests for the Operation of Pressure-Assisted Multi-Point Ground Flare Technology; Request for Comments.

Dear Sir or Madam:

The Texas Commission on Environmental Quality (TCEQ) appreciates the opportunity to respond to the U.S. Environmental Protection Agency's (EPA) notice published in the February 13, 2015 issue of the *Federal Register* entitled: "Receipt of Approval Requests for the Operation of Pressure-Assisted Multi-Point Ground Flare Technology." The notice solicited comment on a request from the Dow Chemical Company (Dow) for an Alternative Means of Emission Limitation (AMEL) under the Clean Air Act (CAA) in order to operate pressure assisted multi-point ground flares at the Propane Dehydrogenation Plant and the Light Hydrocarbons Plant at Dow's Texas Operations site located in Freeport, Texas. The notice also solicited comment on a request from ExxonMobil Chemical Company (ExxonMobil) for an AMEL under the CAA for pressure-assisted multi-point ground flares at the ExxonMobil Olefins Plant in Baytown, Texas, and the Plastics Plant in Mont Belvieu, Texas.

Enclosed please find the TCEQ's comments relating to the referenced AMEL requests. If you have any questions concerning these comments, please contact Mr. Michael Wilson, P.E., Director, Air Permits Division, Office of Air, (512) 239-1922, or via email at mike.wilson@tceq.texas.gov.

Sincerely,

A handwritten signature in black ink that reads "Richard A. Hyde".

Richard A. Hyde, P.E.
Executive Director

Enclosure P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

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